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March 29, 2012

John C. Bottini
Senior Counsel - Environmental

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
No. 7007 0710 0002 0139 0414

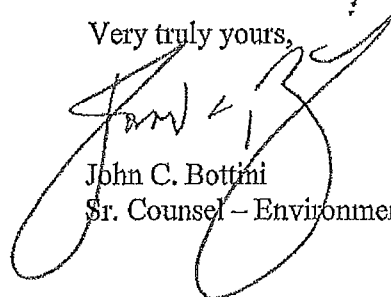
Ms. Deena Sheppard
Enforcement Specialist
U.S. Environmental Protection Agency - Region 5
Superfund Division (SC-5J)
77 West Jackson Blvd.
Chicago, Illinois
60604-3590

**Re: Request for Information Pursuant to Section 104(e) of CERCLA for the
Gary Development Landfill Site located at 479 Cline Avenue, in the City of
Gary, Indiana
(CERCLA ID No. IND077005916)**

Dear Ms. Sheppard:

Enclosed please find Georgia-Pacific LLC's collective response to the three requests for information pursuant to section 104(e) of CERCLA that Georgia-Pacific has received regarding the Gary Development Landfill Superfund Site (the "Site"). Please note that any further correspondence regarding this matter should be directed to me.

Very truly yours,



John C. Bottini
Sr. Counsel - Environmental

Enclosure



Georgia-Pacific

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July 25, 2012

John C. Bottini
Senior Counsel - Environmental

VIA FEDERAL EXPRESS

Ms. Deena Sheppard
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U.S. Environmental Protection Agency, Region 5
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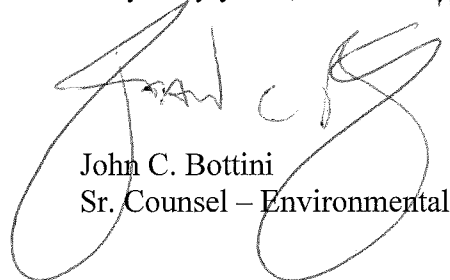
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**Re: Request for Information Pursuant to Section 104(e) of CERCLA for the
Gary Development Landfill Site located at 479 Cline Avenue, in the City
of Gary, Indiana
(CERCLA ID No. IND077005916)**

Dear Ms. Sheppard:

We learned yesterday from your colleague Nicole Wood-Chi that neither you nor Ms. Wood-Chi received Georgia-Pacific LLC's March 29, 2012 response (and electronic attachments) to the above-referenced information request. Attached please find a copy of that response along with two CD-ROMs containing supporting information. A second set of these materials is also being sent this same day via Federal Express to Ms. Wood-Chi. Please feel free to contact me with any further questions.

Very truly yours,



John C. Bottini
Sr. Counsel - Environmental

Enclosure

cc: Ms. Nicole Wood-Chi
Associate Regional Counsel
U.S. EPA Region 5
77 W. Jackson Blvd. C-14J
Chicago, IL 60604

Response of Georgia-Pacific LLC to Request for Information Pursuant to Section 104(e) of CERCLA Regarding the Gary Development Landfill Site Located at 479 Cline Avenue, in the City of Gary, Lake County, Indiana (CERCLIS ID No. IND077005916)

INTRODUCTION

Pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act, as amended ("CERCLA"), Georgia-Pacific LLC ("Georgia-Pacific") respectfully submits the following response to the three requests for information (collectively, the "Request") that Georgia-Pacific received regarding the Gary Development Landfill Site in Gary, Indiana ("Site"). Georgia-Pacific received three separate information requests related to this Site: one addressed to "Georgia Pacific, Assumed Name: Hopper Paper Company" (received on December 5, 2011); and two addressed to "H.P. Smith Paper Company, c/o Georgia Pacific" (one of which was received on November 28, 2011; the second was received on December 5, 2011).

In response to Georgia-Pacific's request for clarification as to the scope of the Request, Ms. Nicole Wood-Chi, EPA Regional Counsel, advised Georgia-Pacific, via e-mail dated December 20, 2011, to "disregard the reference to Hopper Paper Company" and instead respond to the Request "with the understanding that EPA is interested in receiving information regarding Georgia-Pacific's as well as the H.P. Smith Paper Company's operations in Indiana, Illinois, Michigan, Wisconsin, and Ohio from 1970 through 1989." Accordingly, Georgia-Pacific has interpreted all references to "H.P. Smith Paper Company" in the Questions below to include both H.P. Smith Paper Company and Georgia-Pacific and has limited its responses to the date range specified by Ms. Wood-Chi. In that same correspondence, Ms. Wood-Chi agreed to an extension of Georgia-Pacific's response to March 5, 2012. Via telephone conference on February 24, 2012, Ms. Wood-Chi agreed to an additional extension of Georgia-Pacific's response to March 29, 2012.

A. Limitations on Responses

a. Georgia-Pacific

Georgia-Pacific and its affiliated companies currently operate approximately 200 manufacturing facilities across North America, South America and Europe, ranging from large pulp, paper and tissue operations to gypsum plants, box plants and building products complexes. Per Ms. Wood-Chi's instruction, Georgia-Pacific has limited the scope of its investigation to information concerning manufacturing operations that it currently owns and/or operates in Indiana, Illinois, Michigan, Wisconsin, and Ohio for the period of time 1970 through 1989.

Georgia-Pacific has surveyed the manufacturing operations that it currently owns and/or operates in Michigan, Ohio, Indiana, Illinois and Wisconsin for information regarding the Gary Development Landfill. These surveyed facilities were not aware of any information in their possession related to the Site. Through a review of historic files, Georgia-Pacific has located documents that indicate that non-hazardous waste was sent from Georgia-Pacific's former paper mill in Gary, Indiana (the "Gary Mill") to the Site. Accordingly, the Georgia-Pacific responses

provided below solely concern the Gary Mill. In the event Georgia-Pacific uncovers additional information that would suggest that one of the company's other current or former facilities has any connection to the Site, it reserves the right to amend the responses provided herein.

b. H.P. Smith Paper Company

Per Ms. Wood-Chi's instruction, Georgia-Pacific understands that the scope of this Request includes information in Georgia-Pacific's possession concerning the H.P. Smith Paper Company ("H.P. Smith"). Georgia-Pacific's relation to H.P. Smith can be summarized as follows. On or about October 12, 1983, James River Corporation of Virginia entered into a Stock Purchase Agreement with Phillips Petroleum Company and Phillips Petroleum Foundation to purchase all the issued and outstanding capital stock of H. P. Smith. On or about April 22, 1985, H.P. Smith merged into James River U.S. Holdings, Inc. On or about April 29, 1989, James River U.S. Holdings, Inc. merged into James River Paper Company, Inc. On or about April 30, 1991, James River U.S. Holdings, Inc. sold its Specialty Papers Division (which included the former H.P. Smith facilities) to Specialty Coatings Group. Through subsequent name changes and an acquisition, James River Paper Company, Inc. ultimately became Georgia-Pacific Consumer Products LP, which is currently a wholly-owned subsidiary of Georgia-Pacific LLC.

Given the corporate history described above, as well as the limited time period during which Georgia-Pacific's predecessor actually owned the H.P. Smith (1983-1991), Georgia-Pacific has been unable to locate much, if any, information (either in the form of documents or via past or present employees with knowledge) concerning H.P. Smith that is responsive to this Request. In the event Georgia-Pacific uncovers additional information regarding H.P. Smith that is responsive to this Request, it reserves the right to amend the responses provided herein.

c. Additional limitations and reservations of rights

To respond to the Request in a timely manner, Georgia-Pacific has based this response on information available to it at this time. Georgia-Pacific's information concerning the time period at issue in this Request is limited as a result of routine document retention practices as well as the fact that many employees who may have had pertinent knowledge no longer work for the company, or in some cases, may have passed away. Although Georgia-Pacific believes that this response is complete, it reserves the right to amend or supplement this or any other response should it become aware of additional documents or information that it considers material to the Site.

In the course of performing its review, Georgia-Pacific may have found communications between it and counsel that are arguably responsive to the Request, but that fall within the attorney-client or work product privilege. Please be aware that Georgia-Pacific is not providing documents subject to the attorney-client or work product privileges, and the company does not, by providing this response, waive any attorney-client or work product privileges.

By this response, Georgia-Pacific does not waive any rights, defenses, claims or remedies, and makes no admission of any fact, law or liability. Additionally, Georgia-Pacific does not represent that it subscribes to or agrees with any EPA assumption in the matter of the Gary Development Landfill Site.

B. Individuals Consulted

The individual who prepared the response on behalf of Georgia-Pacific LLC is:

John C. Bottini
Senior Counsel – Environmental
Georgia-Pacific LLC
133 Peachtree St., NE
Atlanta, Georgia 30303
(404) 652-4883

Exhibit A contains a list of those current and former employees who were consulted in preparation of this response. Georgia-Pacific requests that the individuals listed in Exhibit A only be contacted through John C. Bottini, Senior Counsel – Environmental, Georgia-Pacific LLC, 133 Peachtree St., NE, Atlanta, GA 30303, (404) 652-4883.

C. Confidential Business Information

Georgia-Pacific is claiming confidential business information ("CBI") status for certain information that has been identified as on the attached CD marked "Confidential Business Information" (the "CBI CD"). The other CD that is not so labeled contains non-confidential materials. The information on the CBI CD is presented in compliance with 40 C.F.R. §§ 2.203(b) and 2.301 pertaining to trade secrets and CBI. The information on the CBI CD is eligible for CBI treatment under 40 C.F.R. § 2.208 for the following reasons: (a) this claim of confidentiality does not have any term or expiration and continues indefinitely; (b) Georgia-Pacific does not release information claimed as CBI to non-employees, except subject to confidentiality agreements; only limited authorized employees have access to the financial information and production information claimed as CBI; Georgia-Pacific intends to continue to keep internal distribution of this material limited and to prohibit external distribution; (c) the information is not, and has not been, obtainable without Georgia-Pacific's consent by use of legitimate means; (d) there is no statutory obligation to disclose this information; and (e) disclosure of this information would harm Georgia-Pacific's competitive position by making risk management information potentially known to Georgia-Pacific's competitors.

D. Attachments

As stated above, enclosed with this letter are two compact discs ("CD") that contain the referenced files in Adobe Acrobat (pdf) format unless otherwise noted. One CD contains those responses and documents that Georgia-Pacific considers CBI. The other CD contains all other responses and documents. These documents and the responses in this letter have been organized to be consistent with the format of the questions in the Request. Where one document is relevant to more than one question, a single copy of that document has been provided.

RESPONSES TO SPECIFIC QUESTIONS

1. Provide copies of all documents, records, and correspondence in your possession relating to Gary Development Landfill.

Exhibit 1 contains copies of all documents, records, and correspondence in Georgia-Pacific's possession that concern the Gary Mill and/or H.P. Smith's relationship to the Site.

2. Identify and describe, and provide all documents that refer or relate to:
 - a. The precise location, address, and name of the facility where disposal, treatment, unloading, management, and handling of the hazardous substances occurred. Provide the official name of the facility and a description of the facility where each hazardous substance involved in such transactions was actually disposed or treated.

Georgia-Pacific is unsure as to the intended scope of Question 2 and its subparts, but assumes for purposes of this response that EPA is seeking information regarding any Georgia-Pacific or H.P. Smith facility that sent hazardous substances to the Site. Georgia-Pacific is aware of two facilities that may have sent material to the Site: (1) an H.P. Smith facility referenced in an October 14, 1996 memorandum prepared by the Indiana Department of Environmental Management (the "1996 IDEM Memo", a copy of which is attached in Exhibit 2(a)); and (2) Georgia-Pacific's former Gary Mill. Each of these facilities is discussed below.

H.P. Smith Paper Company

As described above, a predecessor of Georgia-Pacific, James River Company of Virginia, purchased the stock of H.P. Smith from Phillips Petroleum Company and Phillips Petroleum Foundation, Inc. on October 17, 1983. According to the 1983 stock purchase agreement, H.P. Smith owned two facilities at that time: (a) a facility located at 5001 West 66th Street, Village of Bedford Park (Chicago), Illinois 60638; and (b) a facility located at 2000 Industrial Park Road, Iowa City, Iowa 52240. A copy of the 1983 stock purchase agreement which references these two facilities is attached in Exhibit 2(a).

Georgia-Pacific has been unable to locate any information that would allow it to determine which H.P. Smith facility is identified in the 1996 IDEM Memo. According to the 1996 IDEM Memo, H.P. Smith is listed in a March 11, 1977 letter as one of sixteen (16) generators that allegedly sent waste to the Site. The 1996 IDEM Memo does not identify an address for H.P. Smith. Furthermore, the Memo notes that H.P. Smith's disposal site was listed as "Midwest Solvent Recycling Corporation (MIDCO)." Thus, it is unclear from the 1996 IDEM Memo whether H.P. Smith sent any waste to the Site. It is likewise unclear whether the "drum waste" attributed to H.P. Smith was a "hazardous substance," as that term is defined in the Request.¹

¹ Aside from the 1996 IDEM Memo, the only documents concerning H.P. Smith's waste disposal practices generally that Georgia-Pacific has been able to locate were obtained from EPA as a result of a FOIA request dated November 24, 2003 regarding the Lake Calumet Cluster Superfund Site. Those documents have been previously

Georgia-Pacific's Former Gary Mill

From 1964 until 2002, Georgia-Pacific owned and operated an industrial tissue manufacturing facility at Second Place and Waite Street, Gary, Indiana 46401. A review of available information regarding waste disposal practices at the Gary Mill for the time period 1970 through 1989 suggests that process residuals (in the form of clarifier sludge) and miscellaneous office and mill trash — neither of which met the definition of "hazardous substance" — were, at various times, transported from the Gary Mill to the Site.

All liquid process wastes produced at the Gary Mill were pretreated in a primary clarifier prior to discharging the effluent into the Gary Sanitary Sewer District. Suspended solids, consisting primarily of cellulose fiber and clay fragments, were removed from the clarifier in the form of sludge (hereinafter the "process residuals"). Based on a series of test results completed during the period 1970 through 1989 and attached in Exhibit 2(a), the process residuals were repeatedly determined not to be hazardous waste and the State of Indiana authorized the disposal of the residuals at municipal landfills as well as the Site.

Beginning in or around 1969 and continuing until 1983, the Gary Mill piped its process residuals to two, 6.1-acre lagoons for dewatering and storage. The lagoons were located approximately 0.25 miles northwest of the Gary Mill on property owned by Georgia-Pacific. In or around 1983, the Gary Mill added a screw press to dewater sludge from the clarifier such that storage in the lagoons was no longer necessary except as needed to facilitate closure of the lagoons.

In 1976 and 1977, the holding lagoons were cleaned (one lagoon was completely cleaned; the other partially cleaned), and the process residuals were hauled to the Site by Industrial Disposal Corporation of East Chicago, Indiana.² According to a state inspector, it was estimated that 300,000 cubic yards of process residuals were transported from the Gary Mill lagoons to the Site, although Georgia-Pacific has not been able to confirm that estimate. Georgia-Pacific is not aware of any other shipments of process residuals from the Gary Mill to the Site from 1970 through 1989. Beginning in or around 1970 and continuing at least through 1982, the Gary Mill also contracted with Industrial Disposal Corporation of East Chicago, Indiana to dispose of miscellaneous office waste and mill trash at the Site. Available documentation referencing these transactions is attached in Exhibit 1.

- b. If the location or facility of such disposal, treatment, unloading, management and handling is a different location or facility than what was originally intended, please provide all documents that relate and/or refer to why the substances came to be located at the different location or facility.**

submitted to EPA Region 5, but for the sake of completeness, a set of those documents is also included with this response in Exhibit 2(a). To be clear, none of these documents concerns the Gary Development Landfill Site, and thus Georgia-Pacific does not believe these are relevant to this Request.

² At or near the time of this transaction, Industrial Disposal Corporation's contact information was listed as follows: Industrial Disposal Corporation, 4208 Elm Street, East Chicago, Indiana (mailing address); 1102 E. Columbus Drive, East Chicago, Indiana (garage and office); Dan McArdle, Operation Superintendent (219-397-2664).

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- c. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each arrangement.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- d. All intermediate sites where the hazardous substances involved in each arrangement were transshipped, or where they were stored or held, any time prior to final treatment or disposal.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- e. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement.**

Georgia-Pacific's response to Question 2(a) above summarizes the information and documents it has located concerning any non-hazardous substances that were sent from the Gary Mill to the Site from 1970 through 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- f. The condition of the transferred material containing hazardous substances when it was stored, disposed, treated or transported for disposal or treatment.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- g. The markings on and type, condition and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- h. All tests, analyses, analytical results and manifests concerning each hazardous substance involved in each transaction. Please include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.)**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- i. The final disposition of each of the hazardous substances involved in each arrangement.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- j. All persons, including you, who may have entered into an agreement or contract for the disposal, treatment or transportation of a hazardous substance at or to the Site. Please provide the persons' titles and departments/offices.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- i. The names, addresses, and telephone numbers of persons or entities who received the hazardous substances from the persons described in 2(j) above.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- ii. Any person with whom the persons described in 2(j) made such arrangements.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

iii. The dates when each person described in 2(j) made such arrangements and provide any documentation.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

iv. The steps you or other persons, including persons identified in 2(j) above took to reduce the spillage or leakage. Please identify any operational manuals or policies (e.g. a facility's spill control policy) which address the management of spills and leaks and provide any documentation.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

v. The amount paid by you, or other persons referred to in 2(j) above in connection with each transaction for such arrangement, the method of payment, and the identity of the persons involved. Please provide any contacts, written agreements, or documentation reflecting the terms of the agreements.

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

vi. The amount of money received by you or other persons referred to in 2(j) above for the sale, transfer, or delivery of any material containing hazardous substances and provide any documentation. If the material was repaired, refurbished, or reconditioned, how much money was paid for this service?

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- k. Who controlled and/or transported the hazardous substances prior to delivery to the Site? Provide agreements and/or documents showing the times when each party possessed the hazardous substances.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- l. The owner(s) or possessor(s) (persons in possession) of the hazardous substances involved in each arrangement for disposal or treatment of the substances. If the ownership(s) changed, when did this change(s) occur? Please provide documents describing this transfer of ownership, including the date of transfer, persons involved in the transfer, reason for the transfer of ownership, and details of the arrangement(s) such as contracts, agreements, etc. If you did not own the hazardous substances when shipped, who did own it and how did you come to own the hazardous substances?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- m. Who selected the location where the hazardous substances were to be disposed or treated?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- n. How were the hazardous substances or materials containing hazardous substances planned to be used at the Site?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- o. What was done to the hazardous substances once they were brought to the Site, including any service, repair, recycling, treatment, or disposal.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from its Gary Mill to the Site during the period 1970 to

1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- p. What activities were typically conducted at the Site or the specific facility where the hazardous substances were sent? What were the common business practices at the Site? How and when did you obtain this information?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- q. How were the hazardous substances typically used, handled, or disposed of at the Site?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- r. How long did you have a relationship with the owner(s) and/or operator(s) of the Site?**

Georgia-Pacific has not identified any information responsive to this Question other than that which is provided in response to Question 2(a) above.

- s. Did you have any influence over waste disposal activities at the Site? If so, how?**

Georgia-Pacific has not identified any information responsive to this Question other than that which is provided in response to Question 2(a) above.

- t. What percentage of your total hazardous substances went to the Site?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- u. What steps did you take to dispose of or treat the hazardous substances? Please provide documents, agreements and/or contracts reflecting these steps.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to

1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- v. What involvement (if any) did you have in selecting the particular means and method of disposal of the hazardous substances.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- w. At the time you transferred the hazardous substances, what did you intend to happen to the hazardous substances? Please provide any contracts, written agreements, and/or other documentation reflecting the intention of the parties. If you do not have such documents and/or materials, please so state.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- x. With respect to all transactions involving hazardous substances, at the time of the transaction, specify the measures you took to determine the actual means of treatment, disposal or other uses of hazardous substances. Provide information you had about the treatment and disposal practices at the Site. What assurances, if any, were you given by the owners/operators at the Site regarding the proper handling and ultimate disposition of the materials you sent there?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- y. What efforts, if any, did you take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering (e.g., for repair, consignment, or joint-venture), disposing of, or arranging for the treatment or disposal of any hazardous substances.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- z. Was there a shrinkage/spillage provision or loss allowance in the contract, or an understanding outside of the contract? As a part of the transaction, was there any penalty for shrinkage, spillage, or loss? Did the arrangement acknowledge that spills would occur?**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- 3. Provide names, addresses and telephone numbers of any individuals including former and current employees, who may be knowledgeable of H.P. Smith's operations and hazardous substances handling, storage and disposal practices.**

Those current Georgia-Pacific employees who may have knowledge regarding the Gary Mill's operations and hazardous substance handling, storage and disposal practices include Garry Griffith and Scott Rois, both of whom are listed in Exhibit A. Georgia-Pacific requests that the individuals listed in Exhibit A only be contacted through John C. Bottini, Senior Counsel – Environmental, Georgia-Pacific LLC, 133 Peachtree St., NE, Atlanta, GA 30303, (404) 652-4883.

Georgia-Pacific has been unable to identify any past or present employees who have knowledge regarding H.P. Smith's operations, and therefore Georgia-Pacific has no information responsive to this request as it pertains to H.P. Smith.

- 4. State the date(s) on which the drums and/or hazardous substances were sent, brought or moved to the Site and the names, addresses and telephone numbers of the person(s) making arrangements for the drums to be sent, brought or moved to the Site.**

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989. To the extent Georgia-Pacific has any information in its possession regarding H.P. Smith's connection to the Site, that information is set forth in response to Question 2(a).

- 5. List all federal, state and local permits and/or registrations issued to H.P. Smith for the transport and/or disposal of materials.**

Georgia-Pacific has identified the following approvals (attached in Exhibit 5) issued by the State of Indiana for the time period 1970 through 1989 for the disposal of process residuals and miscellaneous trash from the Gary Mill:

- a. April 16, 1975 memo and accompanying letter from State of Indiana approving the disposal of process residuals from the Gary Mill's lagoons at various construction landfills.**

- b. January 31, 1977 letter from the Indiana Stream Pollution Control Board approving the process residuals and miscellaneous trash disposal practices at the Gary Mill, including the delivery of the residuals and miscellaneous trash to the Site (attached in Exhibit 1).
- c. Correspondence from the Indiana Environmental Management Board to Indiana Waste Systems, Inc. dated August 11 and September 14, 1982 approving the disposal of process residuals from the Gary Mill at the Wheeler Landfill, OPP. No. 64-3, Porter County, Indiana.
- d. August 18, 1983 letter from the Indiana Environmental Management Board to Clark Materials Handling, Inc. approving the disposal of process residuals from the Gary Mill at the Gary Airport exclusion site.

Based on the H.P. Smith waste handling documentation referenced in footnote 1 above, a special waste disposal application was submitted in 1981 to the Illinois Environmental Protection Agency by Alburn, Inc. for the disposal of waste solvents from H.P. Smith's Chicago, Illinois facility. H.P. Smith was later assigned Generator Number 0316000246. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

6. Which shipments or arrangements were sent under each permit? If what happened to the hazardous substances differed from what was specified in the permit, please state, to the best of your knowledge, the basis or reasons for such difference.

Georgia-Pacific has not been able to identify any information, beyond that which is listed in the response to Question 5, that indicates which, if any, shipments or arrangements were sent to the Site between 1970 and 1989 under any waste disposal permit issued to the Gary Mill.

The waste manifests attached in Exhibit 2(a) identify waste shipments that were made from H.P. Smith's Chicago, Illinois facility to Alburn, Inc.'s facility at 119th Street, Chicago, Illinois. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

7. Were all hazardous substances transported by licensed carriers to hazardous waste TSDFs permitted by the U.S. EPA?

As set forth in response to Question 2(a) above, Georgia-Pacific is not aware of any hazardous substances that were sent from the Gary Mill to the Site during the period 1970 to 1989.

The waste manifests attached in Exhibit 2(a) indicate that shipments of hazardous substances from H.P. Smith's Chicago, Illinois facility to Alburn, Inc.'s facility at 119th Street,

Chicago, Illinois were conducted by D & J Waste Refuse, who was licensed to transport such wastes pursuant to EPA Identification No. ILT 180011397 and state Solid Waste Hauler Registration No. 0868.

8. List all federal, state and local permits and/or registrations and their respective permit numbers issued for the transport and/or disposal of wastes.

Based on information available to Georgia-Pacific, the company responsible for hauling non-hazardous waste from the Gary Mill to the Site, Industrial Disposal Company, transported this waste pursuant to Permit No. IN-4507-1000-11. Information in Georgia-Pacific's possession related to the approvals obtained by other third parties for the transport and/or disposal of waste from the Gary Mill during the period of 1970 through 1989 is provided in response to Question 5 above.

The waste manifests attached in Exhibit 2(a) indicate that shipments of hazardous substances from H.P. Smith's Chicago, Illinois facility to Alburn, Inc.'s facility at 119th Street, Chicago, Illinois were conducted by D & J Waste Refuse, who was licensed to transport such wastes pursuant to EPA Identification No. ILT 180011397 and state Solid Waste Hauler Registration No. 0868. The disposal site of the wastes, Alburn, Inc., was assigned EPA Identification No. ILD000716852. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

9. Does your company or business have a permit or permits issued under RCRA? Does it have, or has it ever had, a permit or permits under the hazardous substance laws of the State of Indiana? Does your company or business have an EPA Identification Number, or an identification number supplied by the State Environmental Protection Agency? Supply any such identification number(s) your company or business has.

The Gary Mill submitted a protective Part A Hazardous Waste Permit Application to EPA on or about November 19, 1980. On August 6, 1984, EPA Region 5 accepted Georgia-Pacific's request to withdraw this same application. In this same letter, Region 5 concluded that the Gary Mill was not required to have a hazardous waste permit under Section 3005 of RCRA. A copy of the referenced correspondence between the Gary Mill and EPA Region 5 is attached in Exhibit 9. The EPA identification number assigned to the Gary Mill at that time was IND003938800. Georgia-Pacific is not aware of any other permits issued to the Gary Mill during the time period 1970 through 1989 that concern state or federal hazardous substance laws.

Georgia-Pacific has not been able to identify any information regarding the RCRA permitting status, if any, of any H.P. Smith facility for the time period 1970 through 1989. Based on the H.P. Smith waste handling documentation referenced in footnote 1 above, a special waste disposal application was submitted to the Illinois Environmental Protection Agency by Alburn, Inc. for the disposal of waste solvents from H.P. Smith's Chicago, Illinois facility. H.P. Smith was later assigned a Generator Number 0316000246. The current EPA identification

numbers listed by EPA for the two former H.P. Smith properties identified in the response to Question 2(a) are (1) ILD005120423 (for 5001 West 66th Street, Chicago, Illinois); and (2) IAD050691617 (for 2000 Industrial Park Road, Iowa City, Iowa).

- 10. Identify whether a Notification of Hazardous Waste Activity was ever filed with the EPA or the corresponding agency or official of the State of Indiana, the date of such filing, the wastes described in such notice, the quantity thereof described in such notice, and the identification number assigned to such facility by EPA or the state agency or official.**

The Gary Mill submitted a Notification of Hazardous Waste Activity to EPA Region 5, and received an acknowledgement from Region 5 on October 2, 1981. The following waste codes were listed in the Notification: F001 (spent halogenated solvents used in degreasing), F002 (spent halogenated solvents), F003 (spent non-halogenated solvents), F004 (spent non-halogenated solvents), U002 (acetone), U122 (formaldehyde), U154 (methyl alcohol), and U220 (toluene). Georgia-Pacific has not been able to identify the quantity of the wastes referenced in the Notification materials. The EPA identification number assigned to the Gary Mill was IND003938800.

See response to Question 9 for responsive information in Georgia-Pacific's possession concerning H.P. Smith.

- 11. Provide the correct name and addresses of your plants and other buildings or structures where H.P. Smith carried out operations in Indiana and Illinois (excluding locations where ONLY clerical/office work was performed).**

See response to Question 2(a) above for the correct names and addresses of facilities owned by H.P. Smith and Georgia-Pacific at any time from 1970 through 1989 in Illinois and Indiana that may have had a connection to the Site.

- 12. Provide a schematic diagram or flow chart that fully describes and/or illustrates your company's operations.**

Please see the document attached in Exhibit 12 for information responsive to this Question as it pertains to the Gary Mill. Georgia-Pacific has not identified any information in its possession that is responsive to this Question as it pertains to H.P. Smith.

- 13. Provide a brief description of the nature of your company's operations at each location including: If the nature or size of your company's operations changed over time, describe those changes and the dates they occurred.**

The history of the Gary Mill, to the best of Georgia-Pacific's knowledge, is described as follows. The facility was built in or around 1948 by Gary Post Tribune and was known as the Gary Paper Mill. In 1953, the mill (under the same ownership) began making wallpaper and became known as the Beverly Mill. In 1955, the Beverly Mill was purchased by Steiner Corporation of America and began producing toweling paper. Georgia-Pacific acquired the mill

in 1964 and manufactured industrial tissue at the facility until 2002, at which time the mill was sold to SCA. At some point prior to 1973, it is believed that the Gary Mill added a converting room, shipping warehouse, wastewater treatment primary clarifier, a felt section and a 12-foot Yankee dryer. Beginning in or around 1968 and continuing until 1983, the facility piped process residuals to two approximately 6.1 acre storage lagoons located approximately 0.25 mile northwest of the Gary Mill. In or around 1983, the Gary Mill added a screw press to dewater sludge from the clarifier such that storage in the lagoons was no longer necessary except as needed to facilitate closure of the lagoons. See Exhibit 13 for additional information relevant to historical operations at the Gary Mill.

Georgia-Pacific has been unable to identify relevant documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any information responsive to this Question as it pertains to H.P. Smith.

14. List the types of raw materials used in your company's operations, the products manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Georgia-Pacific's operations at the Gary Mill can be described as follows. Waste paper was purchased from waste paper dealers. This waste paper was placed into large (6' to 12' diameter) tanks (also known as pulpers or beaters) with an agitator in the bottom similar to a Waring blender. Water was then added and this paper was beaten to a slush form. This slush stock was cleaned of debris prior to being pumped to a fourdrier paper machine that made a continuous web of paper toweling.

The Gary Mill used various process additives in its re-pulping and paper-making operations at the Gary Mill from 1970 through 1989. Given the length of time Georgia-Pacific operated the Gary Mill, Georgia-Pacific cannot identify how long (or how much) the following additives may have been used in its processes.

The following chemicals were added to the pulpers in the waste paper process: caustic soda, SOLVOX 261 and sulfuric acid. The following chemicals were added to the water or slush stock on the paper machine: (1) sulfuric acid (to control pH); (2) aluminum sulfate (for retention and to set the rosin size); (3) urea formaldehyde (to give the toweling strength when it is wet); (4) rosin size (to allow the roll towel to dispense from a cabinet); (5) SOLVOX 906 (to make the toweling more absorbent); (6) SOLVOX 1230 (a defoamer); and (7) SOLVOX 615 (to control the release on the Yankee dryer).

Additional process additives may have been used at various times from 1970 through 1989 at the Gary Mill including: (1) deinking aides (Solvax 254 and Texo 586); (2) caustic (sodium hydroxide, in both liquid and flake form); (3) Drewfax R-122 (a release agent for the Yankee dryer); (4) slimicide (Buckman Busan #40); (5) Bubond 65; (6) dyes (Phenamine Fast Scarlet & Stilbene Yellow TP); (7) bleaching agents (Solvax Special K.B., Solvox Special F.B., HTH - Calcium Hypochlorite); (8) hydrochloric acid; (9) muriatic acid; (10) soluble oil; (11) Calgon; (12) Igepal RC 520; (13) soda ash (calcium carbonate); (14) vaporized tall oil; (15) Novaflo 50; (16) Nalco 7620WB & 623NC; (17) Amres 2552; (18) Solvox 870, 718, 165, 174

and 261; (19) salt; (20) Amerpac 8703; and (21) Advantage 101. See Exhibit 14 for additional information.

Georgia-Pacific has been unable to identify any relevant documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any information responsive to this Question as it pertains to H.P. Smith.

15. Provide copies of Material Safety Data Sheets (MSDS) for materials used in your company's operations.

Georgia-Pacific has been able to locate copies of MSDS's for some, but not all, of the raw materials listed in response to Question 14 from the time period 1970 through 1989. Copies of those MSDS's in Georgia-Pacific's possession are attached in Exhibit 15. Georgia-Pacific has been unable to identify any responsive documents regarding the materials that may have been utilized in the operations of H.P. Smith.

16. Provide any release reports that were taken pursuant to Section 103(a) of CERCLA and Section 304 of the Emergency Planning and Community Right-to-Know Act (EPCRA).

Georgia-Pacific has not been able to identify any information regarding release reports that may have been submitted pursuant to Section 103(a) of CERCLA or Section 304 of EPCRA for either the Gary Mill or any H.P. Smith facility for the period of time 1970 through 1989, and therefore has no information responsive to this Question.

17. Identify all federal offices to which H.P. Smith has sent or filed hazardous substance or hazardous waste information.

Georgia-Pacific has located correspondence between the Gary Mill and EPA Region 5 beginning in 1980 concerning hazardous substance or hazardous waste information. See responses to Questions 9 and 10 for more information. Georgia-Pacific has identified a 2005 response to an EPA Region 5 Information Request that it filed on behalf of H.P. Smith regarding the Lake Calumet Cluster Superfund Site.

18. State the years during which such information was sent/filed.

See response to Question 17.

19. Identify (see Definitions) all Illinois and Indiana state offices to which H.P. Smith has sent or filed hazardous substance or hazardous waste information.

Georgia-Pacific has identified correspondence for the time period 1970 through 1989 between the Gary Mill and various Indiana state offices concerning waste disposal issues, including the Indiana Department of Environmental Management (1989); the Indiana State Board of Health, Water Pollution Control Division (1976); Indiana Stream Pollution Control Board (1977); Indiana State Board of Health, Division of Land Pollution Control (1982).

As set forth in footnote 1 above, Georgia-Pacific has identified waste manifests completed by H.P. Smith's Chicago, Illinois facility that reference the Illinois Environmental Protection Agency, Division of Land Pollution Control. These waste manifests are dated 1981 and 1982.

20. State the years during which such information was sent/filed.

See response to Question 19.

21. List all federal and state environmental laws and regulations under which H.P. Smith has reported to federal or state governments, including but not limited to: Toxic Substances Control Act (TSCA), 15 U.S.C. Sections 2601 to 2692; Emergency Planning and Community Right-to-Know Act (EPCRA), 42 U.S.C. Sections 11001 to 11050; and the Clean Water Act 33 U.S.C. Section 1251 to 1387.

During the time period 1970 through 1989, the Gary Mill reported to various federal, state and local governmental authorities pursuant to laws and regulations covering water, waste and air issues. Specific environmental laws and regulations referenced in the available correspondence include: State of Indiana Regulations SPC-15 and SPC-18, Gary Sanitary Sewer District Sewer Use and Pretreatment Ordinance No. 6101, the Gary Air Quality Control Ordinance, EPCRA (Form R and Tier II reports), RCRA, CERCLA and the Clean Water Act.

Based on the H.P. Smith waste handling documentation referenced in footnote 1 above, a special waste disposal application was submitted to the Illinois Environmental Protection Agency in 1981 by Alburn, Inc. for the disposal of waste solvents from H.P. Smith's Chicago, Illinois facility. Georgia-Pacific is not aware of any additional information that is responsive to this Question as it pertains to H.P. Smith.

22. Identify the federal and state offices to which such information was sent.

Georgia-Pacific has identified the following agencies as recipients of the Gary Mill correspondence referenced in response to Question 21: EPA Region 5, the Indiana Department of Environmental Management (and its predecessor agencies), the Gary Sanitary District, and the City of Gary, Air Pollution Control – Division of Department of Health.

See response to Question 21 for responsive information that pertains to H.P. Smith.

23. For each type of waste (including by-products) from H.P. Smith's operations in Indiana and Illinois during the time period of 1975 through 1999, including but not limited to all liquids, sludges, and solids, provide the following information:

a. its physical state;

The primary solid waste generated at the Gary Mill from 1970 through 1989 was papermaking process residuals from its primary clarifier, which has been described above in the response to Question 2(a). An analysis of these process residuals in 1975 stated that the

residuals consisted of 85% water, 14% solids, and 1% bio-degradable materials. From approximately 1969 to 1983, the sludge was stored in two on-site dewatering lagoons. In 1983, the addition of a screw press at the Gary Mill enabled the facility to dewater the residuals, thus increasing the solids content of the residuals and allowing them to be disposed without further pretreatment. Other solid wastes that may have been generated at the Gary Mill from 1970 through 1989 include used oil, empty metal drums, and general plant trash and refuse. Georgia-Pacific has not identified any information that would allow it to respond with specificity as to the physical state of these other waste streams.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as "Solvent N.O.S." — generated at H.P. Smith's Chicago, Illinois facility in 1981 and 1982. This waste was described on waste manifests as a flammable liquid. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

b. its nature and chemical composition;

As set forth in more detail in the response to Question 2(a) above and the accompanying test data attached in Exhibit 2(a), the process residuals generated by the Gary Mill from 1970 through 1989 were determined not to be a hazardous substance. The test data attached in Exhibit 2(a) lists the specific levels of certain constituents in the process residuals. Georgia-Pacific has not identified any information that would allow it to respond with specificity as to the nature and chemical composition of the other waste streams that may have been generated at the Gary Mill during the time period 1970 through 1989.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as "Solvent N.O.S." — generated at H.P. Smith's Chicago, Illinois facility in 1981 and 1982. The documents attached in Exhibit 2(a) provide analytical test results that describe the chemical composition of the material. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

c. its color;

The process residuals generated by the Gary Mill from 1970 through 1989 were gray, although they were also described by a state inspector in a August 19, 1976 memorandum as "moist blue clay." Georgia-Pacific has not identified any information that would allow it to respond with specificity as to the color associated with other waste streams generated at the Gary Mill during the time period 1970 through 1989.

Georgia-Pacific has been unable to locate any information responsive to this Question as it pertains to H.P. Smith.

d. its odor;

The process residuals generated at the Gary Mill from 1970 through 1989 had the smell of wet paper. Georgia-Pacific has not identified any information that would allow it to respond with specificity as to any odor associated with other waste streams generated at the Gary Mill during the time period 1970 through 1989.

Georgia-Pacific has been unable to locate any information responsive to this Question as it pertains to H.P. Smith.

- e. **the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and**

To the best of Georgia-Pacific's knowledge, approximately 5-10 tons of process residuals were generated per day at the Gary Mill. That number, however, was likely to have fluctuated throughout the relevant time period (1970 through 1989) based on production levels. Georgia-Pacific has not been able to identify any information regarding the approximate monthly and annual volumes of other types of waste generating at the Gary Mill from 1970 through 1989.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as "Solvent N.O.S." — generated at H.P. Smith's Chicago, Illinois facility in 1981 and 1982. According to a 1981 special waste disposal application (included within Exhibit 2(a)), the estimated annual waste volume of waste solvents was 100,000 gallons. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

- f. **the dates (beginning & ending) during which each type of waste was produced by Your company's operations.**

The Gary Mill produced process residuals throughout the time period 1970 through 1989. Georgia-Pacific has not identified any information that would allow it to respond with specificity as to when the other waste streams at the Gary Mill were first generated and when, or if, the generation of such waste streams ceased at any time from 1970 through 1989.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as "Solvent N.O.S." — generated at H.P. Smith's Chicago, Illinois facility in 1981 and 1982. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

- 24. **Provide a schematic diagram that indicates which part of H.P. Smith's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.**

Georgia-Pacific has been unable to locate a document or an individual with knowledge that can provide an accurate diagram that is responsive to Question 24 as it pertains to either the Gary Mill or H.P. Smith.

25. Describe how each type of waste was collected and stored at H.P. Smith's operation prior to disposal/recycling/sale/transport, including:

a. the type of container in which each type of waste was placed/stored; and

From 1970 until in or around 1983, the process residuals generated at the Gary Mill were piped to the two on-site lagoons for storage and dewatering. Beginning in or around 1983, the installation of a screw press at the Gary Mill allowed the dewatered sludge to be transported directly from the Mill to the Gary Airport exclusion site. Georgia-Pacific has not been able to identify any information regarding the specific types of containers in which other types of waste was placed/stored at the Gary Mill from 1970 through 1989.

Based on the H.P. Smith waste manifests referenced in footnote 1 above, Georgia-Pacific has identified a single waste stream — referred to as "Solvent N.O.S." — generated at H.P. Smith's Chicago, Illinois facility in 1981 and 1982. According to the manifests, this waste stream was transported in drums. Georgia-Pacific has been unable to identify any additional documents or past or present employees who have knowledge regarding the operations of H.P. Smith, and therefore Georgia-Pacific does not have any additional information responsive to this Question as it pertains to H.P. Smith.

b. where each type of waste was collected/stored.

From 1970 until in or around 1983, the Gary Mill's process residuals were piped to the two on-site lagoons for storage and dewatering. Beginning in or around 1983, the installation of a screw press at the Gary Mill allowed the dewatered sludge to be transported directly from the Mill to the Gary Airport exclusion site. Georgia-Pacific has not been able to identify any information regarding the specific location where other types of waste were collected or stored at the Gary Mill from 1970 through 1989.

Georgia-Pacific has been unable to locate any information responsive to this Question as it pertains to H.P. Smith.

26. Provide copies of all casualty, liability and/or pollution insurance policies, and any other insurance contracts related to the Gary Development Landfill (including, but not limited to, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies, Institutional Controls and Post Remediation Care Insurance) that provide H.P. Smith with liability insurance for damage to third party property from 1975 through 1999.

Please see Exhibit 26 on CBI CD for Georgia-Pacific's response to this Question.

27. To the extent not provided in Question 26 above, provide copies of all insurance policies that may potentially provide H.P. Smith with insurance for bodily injury,

property damage and/or environmental contamination in connection with the Site and/or H.P. Smith's business operations. Include, without limitation, all comprehensive general liability, primary, excess, and umbrella policies.

Please see response to Question 26.

- 28. To the extent not identified in Questions 26 or 27 above, provide all other evidence of casualty, liability and/or pollution insurance issued to your company for the period being investigated as identified in Question 26.**

Please see response to Question 26.

- 29. If there are any such policies from Questions 26, 27, or 28 above of which you are aware but neither possess copies, nor are able to obtain copies, identify each such policy to the best of your ability by identifying:**

- a. The name and address of each insurer and of the insured;**

Please see response to Question 26.

- b. The type of policy and policy numbers;**

Please see response to Question 26.

- c. The per occurrence policy limits of each policy; and**

Please see response to Question 26.

- d. The effective dates for each policy.**

Please see response to Question 26.

- 30. Identify all insurance brokers or agents who placed insurance for the H.P. Smith at any time during the period being investigated as identified in Question 26, and identify the time period during which such broker or agent acted in this regard. Identify by name and title, if known, individuals at the agency or brokerage most familiar with H.P. Smith's pollution and/or liability insurance program and the current whereabouts of each individual.**

To the best of Georgia-Pacific's knowledge, the primary insurance broker for the James River Corporation policies listed in response to Question 26 was Alexander & Alexander of Richmond, Virginia. The primary insurance broker for the Georgia-Pacific Corporation policies listed in response to Question 26 was Marsh & McLennan of Portland, Oregon.

- 31. Identify all previous settlements by your company (or your company's predecessors) with any insurer which relates in any way to environmental liabilities and/or to the policies referenced in Questions 26-29 above, including:**

- a. **The date of the settlement;**

Please see Exhibit 31 on CBI CD for Georgia-Pacific's response to the Question.

- b. **The scope of release provided under such settlement;**

See response to Question 31(a).

- c. **The amount of money paid by the insurer pursuant to such settlement.
Provide copies of all such settlement agreements.**

See response to Question 31(a).

- 32. Identify all communications and provide all documents that evidence, refer, or relate to claims made by or on behalf of the H.P. Smith under any insurance policy referenced in Questions 26-29 above. Include any responses from the insurer with respect to any claims.**

Georgia-Pacific respectfully objects to this Question as overly broad and unduly burdensome, especially considering the number of years and insurance policies at issue. Should any of the policies referenced in response to Question 26 become material to EPA's investigation, Georgia-Pacific will supplement its responses to address specific policies and relevant communications and claims related to those particular policies upon request.

- 33. Identify any and all insurance, accounts paid or accounting files that identify H.P. Smith's insurance policies.**

Georgia-Pacific respectfully objects to this Question as overly broad and unduly burdensome, especially considering the number of years and insurance policies at issue. Should any of the policies referenced in response to Question 26 become material to EPA's investigation, Georgia-Pacific will supplement its responses to address specific policies and files that Georgia-Pacific may have in its possession that are related to those particular policies upon request.

- 34. List all named insureds on property, pollution and/or casualty liability insurance providing coverage to H.P. Smith during the period being investigated as identified in Question 26, and the date such named insureds appeared on the policies.**

In general, the named insureds on the insurance policies referenced in response to Question 26 above are, in the case of Georgia-Pacific, Georgia-Pacific Corporation at its subsidiaries. In the case of James River, the named insureds on the referenced policies are listed as James River Corporation and its subsidiaries.

- 35. Identify any person or organization requiring evidence of H.P. Smith's casualty, liability and/or pollution insurance during the period being investigated as identified in Question 26, including the nature of the insurance requirement and the years when the evidence was required.**

Georgia-Pacific respectfully objects to this Question as overly broad and unduly burdensome, especially considering the number of years and insurance policies at issue. Should any of the policies referenced in response to Question 26 become material to EPA's investigation, Georgia-Pacific is willing to supplement its responses to address specific policies and relevant communications and claims related to those particular policies upon request.

36. Identify your company's policy with respect to document retention.

Georgia-Pacific's official records retention policy contains information that the company views as privileged and confidential. In the event EPA can identify specific aspects of Georgia-Pacific's policy that the agency views as material to its investigation, Georgia-Pacific is willing to address such provisions upon request. In general, Georgia-Pacific's policy is to comply with all record retention provisions set forth in applicable environmental laws and regulations.

Certification of Authorized Representative

I certify that under a penalty of law that this document and all Enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.


Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: _____

Print Name: John C. Bottini

Title: Senior Counsel – Environmental, Georgia-Pacific LLC

Date: March 29, 2012

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
		B. Received by (Printed Name)	C. Date of Delivery
<p>1. Article Addressed to:</p> <p>Ms. Deena Sheppard, Enforce. Spec. U.S. EPA - Region 5 Superfund Division (SC-5J) 77 West Jackson Blvd. Chicago, IL 60604-3590</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7007 0710 0002 0139 0414</p>			
PS Form 3811, February 2004		Domestic Return Receipt	
		102595-02-M-1540	

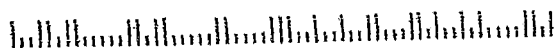
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John C. Bottini
Georgia-Pacific LLC
133 Peachtree St.
Atlanta, GA 30303





Georgia-Pacific Corporation

201
2A
Second Place and Waite Street
Gary, Indiana 46401
Telephone (219) 977-1600

Nov 19 3 23 PM '76

INDIANA STATE
BOARD OF HEALTH
DIVISION OF November 18, 1976
POLLUTION CONTROL

Mr. Jim Hunt
Water Pollution Control Division
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana 46206

Re: Industrial Waste Disposal Information

Dear Mr. Hunt:

In response to Mr. Hert's inquiry about our solid waste disposal, I would like to point out that we are engaged in the manufacture of paper towels. The nature of our manufacturing process is such that trimmings, quality rejects, and spoiled production are returned to the process to reclaim the raw materials. Thus we have no need to dispose of manufacturing scrap as a solid waste. Our plant generates two types of solid waste.

A. Clarifier Sludge - All of our liquid industrial wastes are pretreated in a primary clarifier before discharging the effluent into the Gary Sanitary District sewer. Suspended solids are removed from the cone of this clarifier in the form of a sludge. This clarifier sludge consists mostly of cellulose fiber fragments. Ignition of the sludge leaves about 40% ash resulting from clay and other inorganic pigments washed out of waste paper during our manufacturing process. To our knowledge, this sludge contains no significant amounts of toxic chemicals, flammable materials, or pathogenic organisms. It is my opinion that this sludge when dewatered to greater than 30% solids would not be a hazardous waste as defined in Regulation SPC-18.

Approximately 7 tons (dry basis) of this sludge are generated each day and pumped to large lagoons for dewatering and storage. These lagoons are owned by us. Industrial Disposal Company of East Chicago, Indiana, has been contracted to periodically remove dewatered sludge from our lagoons for disposal at landfill sites not owned by Georgia-Pacific. As removed from our lagoons, this sludge is a solid containing substantially less than 70% moisture. Industrial Disposal Company holds a permit (IN-4507-1000-11) to dispose of this waste

-continued-

B. Miscellaneous Trash - Wire bands from baled waste paper and assorted trash collected within the plant are compacted. About 40 cubic yards of compacted trash are disposed of each week by the Industrial Disposal Company of East Chicago, Indiana, at an off-site location.

Georgia-Pacific Corporation and its contractor, Industrial Disposal Company, are to the best of my knowledge, in compliance with Regulation SPC-18. I will be happy to answer any questions regarding our wastes or our disposal methods.

Sincerely,


Reynold J. Conger
Technical Director

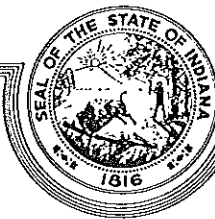
RJC:bm

cc: C.S. Adamczyk
P. Bean
R. Sherwood

201

STATE OF INDIANA

STREAM POLLUTION CONTROL BOARD



INDIANAPOLIS 46206

1330 West Michigan Street
633-5467

January 31, 1977

Georgia-Pacific Corporation
Second Place and Waite Street
Gary, Indiana 46401

Attention: Reynold J. Conger
Technical Director

Gentlemen:

Re: Industrial Waste Disposal Inquiry

We wish to thank you for your prompt response to our above-referenced letter dated October 18, 1976. Our staff has reviewed your response and believe that these wastes are being disposed of in an acceptable manner.

If you have any questions relative to disposal of your industrial wastes in the future, please feel free to contact our Solid Waste Management Section at AC 317/633-6400.

Very truly yours,

Oral H. Hert
Technical Secretary

GD/sjk
cc: Enforcement Branch

CHARGE ACCOUNT NUMBER		DATE STUBBINS CHECK		08207																																																																													
302-0431-0027		PURCHASE ORDER		NoG 31134																																																																													
Georgia-Pacific Corporation Industrial Tissue Division P.O. Box 364 • Second Place and Waite St. • Gary, In. 46401 Telephone (219) 977-1600 • TWX (910) 698-2523				INVOICE INSTRUCTIONS DEPARTMENT AND PURCHASE ORDER NUMBERS MUST BE SHOWN ON EACH INVOICE. SHIPPING PAPER, PACKAGE AND ALL CORRESPONDENCE.																																																																													
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TO INDUSTRIAL DISPOSAL CORP. 4208 ELLIOT ST. EAST CHICAGO, IND.			SHIPPING INSTRUCTIONS: ON SITE DELIVERIES WILL BE ACCEPTED BETWEEN THE HOURS OF 7 A.M. AND 2 P.M. <input type="checkbox"/> TAXABLE <input type="checkbox"/> NONTAXABLE RESALE CERTIFICATE NO. 187-20-09																																																																														
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	TO COVER THE COST OF REMOVING SLUDGE FROM OUR <u>SOUTH</u> EVAPORATION LAGOON THIS ORDER SUPERCEDES OUR PO #G-30893, DATED 4-22-76 <div style="text-align: center; font-size: 2em; transform: rotate(-15deg); opacity: 0.5;"> No record </div> <div style="text-align: center; font-size: 1.5em; transform: rotate(-15deg); opacity: 0.5;"> CONFIRMING ORDER TO: EAS, 6-4-76 BY: DAVID L. STUBBINS, PER PHONE </div> <div style="text-align: center; font-size: 1.5em; transform: rotate(-15deg); opacity: 0.5;"> Dave said to use this to pay invoice </div>																																																																																
VENDOR INVOICES PASSED <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>DATE PASSED</th> <th>DATE OF INVOICE</th> <th>INVOICE NUMBER</th> <th>AMOUNT OF INVOICE</th> </tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> </table>				DATE PASSED	DATE OF INVOICE	INVOICE NUMBER	AMOUNT OF INVOICE																																					Georgia-Pacific Corporation <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th>DATE PASSED</th> <th>DATE OF BILL</th> <th>TRANSPORTATION BILLS PASSED</th> <th>AMOUNT OF BILL</th> </tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> </table>		DATE PASSED	DATE OF BILL	TRANSPORTATION BILLS PASSED	AMOUNT OF BILL																																
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ASW
 6-8-76

INDUSTRIAL DISPOSAL CORP. 02466

GARAGE AND OFFICE
1102 E. COLUMBUS DR.
EX 7-2884

EAST CHICAGO, INDIANA

MAILING ADDRESS
4208 ELM STREET
EX 7-6585

DATE January 10, 1977

Georgia Pacific Corp. 36.20
P.O. Box 364
Gary, Indiana 46401

DATE	DESCRIPTION	AMOUNT
	<p>SERVICES FOR THE MONTH OF <u>January, 1977</u> <u>P.O. G 31134</u></p> <p><i>Done Paid O.K. to pay 1-12-77 gc</i></p>	<p>\$ 1755.00 2691.00 2398.50 2223.00 1228.50 1930.50 994.50 2398.50 1638.00 <u>\$17257.50</u></p>

201 f

HAZARDOUS WASTE WORK SHEET

GENERATOR Georgia-Pacific
ADDRESS Steiner Paper Div.
2nd Place
Gary, Ind.
TELEPHONE _____
PERSON(S) CONTACTED Mr. Chester Anamczyk

Waste Description (process, treatment, dewatering device, chemical characteristics, physical characteristics, i.e. percent solids)

5/10/75 Awaiting analysis from Crompton
8/10/76 DAYHUFF, J. OBSERVED INDUSTRIAL DISPOSAL TRUCKS DUMPING
THE GA. PACIFIC SLUDGE AT THE GARY LAND DEVELOPMENT
I.E. ON THIS DATE $\approx 100,000 yd^3$ APPEARS TO HAVE BEEN
DEPOSITED. WORK WAS GOING ON AT THE SITE OF THE
GA. PF. SLUDGE BEDS & APP. TO BE $\frac{1}{4}$ DONE, I.E. $\approx 300,000 yd^3$
REMAINING TO BE DISPOSED OF.

10444

10444

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: August 19, 1976

FROM:

George Dayhuff *GD*

TO:

Georgia Pacific Hazardous Waste File

SUBJECT: Disposal of Georgia Pacific Sludge at
the Gary Land Development Landfill

On August 10, 1976, Bruce Palin and I observed the above referenced sludge being deposited by Industrial Disposal. After a thorough inspection of the site, it was determined that approximately 100,000 cubic yards of this sludge had been deposited within a 7-day period.

This material has the consistency of moist blue clay. The operator of the site is using this sludge for constructing wind walls and for intermediate cover.

After inspecting the landfill, we went to the area where Georgia Pacific has their sludge drying beds near the intersection of Clark Road and Industrial Highway. Industrial Disposal's equipment was in the process of digging out these lagoons and appeared to be about 1/4 of the way done.

We need an accurate and complete analysis of this sludge. Palin will get a sample on his next visit to the area.

GD/sjk

cc: Bruce Palin

*Gary Land Dev't
Lohr Co.*

3

201

2A

LABORATORY REPORT



2P1

Seaway Industrial Laboratories, Inc.

AIR and WATER POLLUTION CONSULTANTS

542-544 CONKEY STREET
HAMMOND, INDIANA 46324
219-932-1770

CLIENT:

INDUSTRIAL DISPOSAL CORPORATION
1102 East Columbus Drive
East Chicago, IN.
46312

INVESTIGATION:

Leaching test on G.P. Sludge.
Sample submitted on 8-17-76.

Period Covered	Date of Our Report	Laboratory No.
	8-25-76	QON 7730

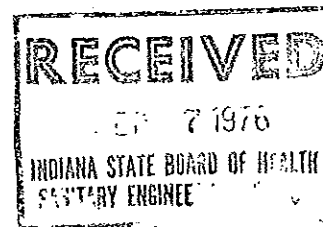
RESULTS:

Chemical determination

pH	6.7
Lead--mg/liter pb	0.84
Cadmium--mg/liter Cd	0.03
Zinc--mg/liter Zn	0.18
Nickel--mg/liter Ni	Negative

ARSENIC

0.003 *1/10000*



1. duplicates

Respectfully submitted

SEAWAY INDUSTRIAL LABS., INC.

C. J. Cichon
C. J. CICHON, Director

Gary Land Development
Lake Co.

201

August 9, 1976

Mr. Ted Peters
Industrial Disposal Company
1301 Columbus Avenue
East Chicago, Indiana 46312

Dear Mr. Peters:

Re: Disposal of Sludge From
Georgia-Pacific Corporation
Gary, Indiana
Lake County

This is to inform your company that disposal of the above-referenced paper sludge is not acceptable at the Gary Land Development Landfill in Lake County. Due to the landfill already having a leachate problem, the disposal of liquids and semi-liquids into the refuse at this landfill would only increase the leachate problem. It is our understanding that this paper sludge is approximately 85 percent water. If the sludge could be dewatered to the point that it was cake-like, disposal into the Gary Land Development site to be mixed with refuse would be acceptable.

We suggest the possibility of dewatering be investigated so land disposal may be utilized. Without further dewatering, this office cannot allow this material to be landfilled. Please contact Mr. George Dayhuff or Mr. Johnie Baker of the Solid Waste Management Section at AC 317/633-6400 by September 1, 1976, as to your plans for disposal of this sludge.

Very truly yours,

Roland P. Dove, Director
Division of Sanitary Engineering


JRB/mjh
cc: Gary Land Development
Georgia-Pacific Corporation
Mr. Dick Cleaton
Mr. Patrick Stevens

HAZARDOUS WASTE WORK SHEET

GENERATOR GEORGIA-PACIFIC CORP.
 ADDRESS 2ND PLACE & WHITE ST.
P.O. Box 364
GARY, IN. 46401
 TELEPHONE _____
 PERSON(S) CONTACTED K.A. Summerlin - Plant Mgr.

Waste Description (process, treatment, dewatering device, chemical characteristics, physical characteristics, i.e. percent solids)

8-5-76 DDL RECEIVED A CALL FROM DICK CREATON (F.I.S.)
 questioning why Gary Land Development had not
 been approved for disposal of company's paper sludge
 8-6-76 According to our records, this sludge is $\approx 85\%$ water.
 Therefore, with this & an existing leachate problem at
 Gary Land, JRS drafted letter explaining why approval
 couldn't be granted & suggesting further dewatering
 Aug. 19 '76 Dayhoff & Polin investigated disposal of Aug. 10 MEMO ATTACHED
 9-7-76 Analysis submitted by Industrial Disposal.
 9-16-76 THIS MATERIAL WAS TAKEN TO THE GARY LAND
 DEVELOPMENT L.F. $\approx 300,000 \text{ YD}^3$ WERE
 DISP. OF. THE ANAL. CAME AFTER THE FACT.
 (NO LTR WAS SENT)


 C000044

10-12-83 EXEC.

STOCK PURCHASE AGREEMENT

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EXHIBITS

Exhibit A-1	1983 Balance Sheet
Exhibit A-2	1983 Income Statement
Exhibit A-3	Six Year Summary
Exhibit B	Undisclosed Liabilities
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10-12-83 EXEC.

STOCK PURCHASE AGREEMENT

This Agreement entered into as of the 12th day of October, 1983, between PHILLIPS PETROLEUM COMPANY, a Delaware corporation with an address of 16th Floor, Phillips Building, Bartlesville, Oklahoma 74004, herein referred to as "Phillips", and PHILLIPS PETROLEUM FOUNDATION, INC., an Oklahoma non-profit corporation with an address of 4B1 Phillips Building, Bartlesville, Oklahoma 74004, herein referred to as "Foundation", Phillips and Foundation being herein jointly referred to as "Sellers", and JAMES RIVER CORPORATION OF VIRGINIA, a Virginia corporation with an address of Tredegar Street (P. O. Box 2218), Richmond, Virginia 23217, herein referred to as "Buyer";

WITNESSETH:

Sellers and Buyer hereby agree as follows with respect to the sale by Sellers and the purchase by Buyer of all of the issued and outstanding capital stock of H. P. Smith Paper Co., an Illinois corporation, herein referred to as "H. P. Smith":

1. SALE AND PURCHASE.

Sellers hereby agree to sell to Buyer all of the issued and outstanding shares of the capital stock of H. P. Smith, herein referred to as the "Stock," and Buyer agrees to purchase said Stock, in accordance with the terms and

conditions set forth in this agreement and the Exhibits attached hereto, herein collectively referred to as the "Agreement".

2. PURCHASE PRICE.

The aggregate purchase price for all of said Stock shall be the sum of Thirty-four Million Five Hundred Thousand Dollars (\$34,500,000.00), and Buyer, subject to the terms and conditions of this Agreement, will purchase said Stock from Sellers at said purchase price.

3. EFFECTIVE TIME AND CLOSING.

A. Effective Time.

The sale of said Stock shall be effective as of 11:59 P.M. Chicago time, on the 15th day of October, 1983, herein referred to as the "Effective Time".

B. Closing Date.

The sale shall be closed at Bartlesville, Oklahoma at 10:00 A.M. local time as observed on such date, on October 14, 1983, or at such other time and place as may be agreed upon in writing by Sellers and Buyer, said date being herein referred to as the "Closing Date." On said date, Sellers shall deliver or tender delivery to Buyer certificates representing the Stock and appropriate instruments of transfer assigning the Stock to Buyer, free and clear of all liens and encumbrances, and with all requisite stock transfer stamps attached and stock transfer taxes paid. Upon

such delivery or tender of delivery, Buyer shall pay to Sellers the sum of Thirty-four Million Five Hundred Thousand Dollars (\$34,500,000) as follows: to Phillips Thirty-one Million Fifty Thousand Dollars (\$31,050,000) by wire transfer in immediately available federal funds to Phillips' General Account No. 00042892 in Citibank N.A., New York, New York; and to Foundation Three Million Four Hundred Fifty Thousand Dollars (\$3,450,000) by wire transfer in immediately available federal funds to Phillips, as agent for Foundation, to Phillips' General Account No. 00042892 in Citibank N.A., New York, New York.

C. Directors and Officers.

At closing, Sellers will deliver or cause to be delivered, effective on or before the Effective Time, written resignations, as directors and officers of H. P. Smith, of all persons then holding such offices, and evidence of the termination, as employee benefit board or committee members of H. P. Smith, of all persons then holding office as such member.

D. Partial Sale.

If Phillips shall tender the stock in H. P. Smith owned by Phillips and Foundation shall for any reason fail to tender the stock in H. P. Smith owned by Foundation, Buyer shall have the option to buy the

Phillips stock for the price payable to Phillips as described herein, but the exercise of such option shall not release Foundation from any of its obligations hereunder.

E. Closing Simultaneous.

At the closing all proceedings shall take place simultaneously and no delivery shall be considered to have been made until all such proceedings have been completed.

4. TERMINATION.

This Agreement may be terminated only in the following events and by written notice by the party so terminating to each of the other parties specifying the reason for such termination:

A. By Buyer, at its option, in the event:

(1) Sellers or either of them should fail for any reason to deliver or tender delivery of the Stock on the Closing Date as herein provided or fail in material respects to comply with the terms, conditions and provisions of this Agreement; or

(2) there is any material failure in representations and warranties of Sellers in this Agreement.

B. By either Seller, at its option, in the event:

(1) Buyer should fail for any reason to make payment for the Stock hereunder on the Closing Date as herein provided or fail in material respects to comply with the terms, conditions and provisions of this Agreement; or

(2) there is any material breach in representations and warranties of Buyer in this Agreement.

C. By any party hereto, at its option, in the event:

(1) its Board of Directors determines reasonably and in good faith that the conditions to its obligations are unlikely to be fulfilled on or before November 1, 1983; or

(2) for whatever reason, the sale of the Stock is not closed hereunder on or before November 1, 1983.

In the event this Agreement is terminated by any party under the provisions of this Section 4, each of the parties to this Agreement shall be relieved from any and all further obligations under or by virtue of this Agreement; provided that any such termination by Foundation in a case where Phillips does not terminate shall be effective only as to Foundation.

5. REPRESENTATIONS, WARRANTIES AND AGREEMENTS OF SELLERS.

The representations, warranties and agreements in this Section 5 and elsewhere in this Agreement are made, insofar as they relate to Sellers, or a specific Seller, only individually by each Seller as to it, but insofar as they relate to H. P. Smith are made by both Sellers, jointly and severally, to Buyer but as between Sellers each shall have proportionate responsibility.

Sellers represent, warrant and agree as follows:

A. Organization, Standing, Capitalization and Stock Ownership of H. P. Smith.

H. P. Smith is, and will be on the Closing Date, a corporation duly organized, validly existing and in good standing under the laws of the State of Illinois, duly qualified and authorized to do business as a foreign corporation in the States of Arkansas, California, Colorado, Florida, Illinois, Iowa, Louisiana, Massachusetts, Michigan, Minnesota, Nebraska, New Jersey, Ohio, Oregon, Pennsylvania, Tennessee and Washington, there being no other States where H. P. Smith owns or leases real property or maintains a stock of inventory or to the best knowledge of Sellers where a failure to be so qualified would have a material adverse effect on the business of H. P. Smith, with total authorized capital stock of five thousand (5,000) shares of common stock having a par value of Fifty Dollars (\$50.00) per share, of which two thousand three hundred fifty (2,350) shares have been subscribed without having violated any pre-emptive right to subscribe to common stock or to any security convertible into common stock, are fully paid, nonassessable, duly and regularly issued and outstanding, and are and will be on the Closing Date owned and held by Sellers, free and clear of any liens or encumbrances, two thousand one

hundred fifteen (2,115) of which are and will be owned and held by Phillips and two hundred thirty-five (235) of which are and will be owned and held by Foundation, and there are, and except for this Agreement at the Closing Date will be, no outstanding stock warrants, options or rights to acquire any of the stock of H. P. Smith or any security convertible into such stock. The instruments of transfer of such stock to be delivered by Sellers to Buyer at the closing will transfer to Buyer good and marketable title to the shares of such stock, free and clear of all liens and encumbrances. Fifty (50) shares of stock are issued but not outstanding and are held by H. P. Smith as Treasury Shares. H. P. Smith's principal place of business is at 5001 West 66th Street, Village of Bedford Park (Chicago), Illinois, at which place most of its business and financial books and records are kept and maintained and at which its corporate books and records are located or will be located promptly after the Closing Date. H. P. Smith also has a plant at 2000 Industrial Park Road, Iowa City, Iowa, but has no office or assets at any other location except inventory located at distribution centers and automobiles assigned to sales personnel. All books and records of H. P. Smith (or copies thereof) in the hands of either Seller which

relate to the business of H. P. Smith or to assets, if any, to be transferred to H. P. Smith on or prior to the Closing Date, as contemplated in this Agreement, have been, or as soon as practicable after the Closing Date will be, transferred to H. P. Smith at its Chicago offices. A copy of H. P. Smith's Articles of Incorporation and all amendments thereto to date, certified by the Secretary of State of Illinois, and of the By-Laws of H. P. Smith, as amended to date, certified by the Secretary of H. P. Smith, heretofore furnished by Sellers to Buyer, are true, correct and complete copies of said Articles of Incorporation and By-Laws as amended, as of this date, and there have been, and before the Closing Date will be, no other amendments thereto without the consent of Buyer.

B. Financial Statements.

Exhibits A-1, A-2, and A-3 are copies of an unaudited balance sheet of H. P. Smith as at June 30, 1983, herein referred to as the "1983 Balance Sheet," Statement of Income for the six months ending June 30, 1983, for H. P. Smith, herein referred to as the "1983 Income Statement," collectively referred to herein as the "1983 Statements", and summary of earnings of H. P. Smith for the preceding six-year period, herein referred to as the "Six Year Summary". The 1983

Statements are true and complete, except for the omission of footnotes, have been prepared in accordance with generally accepted accounting principles applied on a consistent basis, and fairly present H. P. Smith's financial condition and its assets and liabilities as of June 30, 1983 and its results of operations for the six months then ended. The Six Year Summary has been prepared in accordance with generally accepted accounting principles applied on a consistent basis and fairly presents the results of the operations of H. P. Smith for the respective periods indicated thereby.

C. Undisclosed Liabilities.

Except as and to the extent reflected or reserved against in the 1983 Balance Sheet or otherwise disclosed in Exhibit B, H. P. Smith has no known liabilities, whether due or to become due, absolute or contingent, including, without limitation, all taxes, corporate or otherwise, or any known condition that could reasonably be expected to give rise to such liability, arising out of the business, operations or income of H. P. Smith, which in the aggregate exceed \$350,000, nor do Sellers know or have reasonable grounds to know of any assertion or of any basis for the

assertion against H. P. Smith of any such liability except as disclosed on Exhibit C.

D. Absence of Changes.

Since June 30, 1983, there has not been:

(1) any change in H. P. Smith's financial condition, assets, liabilities or business, not disclosed in this Agreement, other than changes in the ordinary course of business, none of which have been materially adverse;

(2) any damage, destruction or loss, whether or not covered by insurance, materially and adversely affecting H. P. Smith's properties or business;

(3) any declaration, setting aside or payment of any dividend or other distribution in respect of H. P. Smith's capital stock, or any direct or indirect redemption, purchase or other acquisition of any of such stock except the two hundred thirty-five (235) shares acquired by Foundation from Phillips;

(4) any increase in the compensation payable or to become payable by H. P. Smith to any of its officers, employees or agents, or any bonus payment or arrangement made to or with any of same, except to the extent reflected in Section 5H below or by the lists referred to in said Section 5H;

(5) any labor trouble materially and adversely affecting H. P. Smith's business or prospects; or

(6) any event or condition of any character materially and adversely affecting H. P. Smith's business or prospects except as otherwise herein disclosed.

E. Title to Assets; Absence of Liens and Encumbrances.

H. P. Smith has and will have as of the Closing Date good and marketable title to all of its assets, including those reflected in the 1983 Balance Sheet,

except such assets as have been disposed of in the usual and ordinary course of business, subject to no lien, security interest, mortgage, or other encumbrance except as set forth on Exhibit D; provided, however, H. P. Smith's Iowa City, Iowa, plant is not owned by H. P. Smith but is a leasehold asset held under a revenue bond lease from the City of Iowa City, Iowa. Except as disclosed in this Agreement, no assets primarily used in the business of H. P. Smith are owned by Phillips or by any affiliate of Phillips (a corporation in which Phillips directly or indirectly owns more than fifty percent (50%) of the voting rights) other than H. P. Smith.

F. Accounts Receivable.

All accounts receivable of H. P. Smith at the Effective Time will represent obligations created by bona fide sales (as distinguished from consignment, sale on approval or any form of conditional transaction), and all instruments and documents relating to H. P. Smith's accounts receivable will be valid and genuine and said accounts receivable will be due and owing.

G. Contracts.

H. P. Smith has no presently existing contracts or commitments or leases (whether of real or personal property and whether H. P. Smith is lessee or lessor)

except as listed on Exhibit E, or on other Exhibits to this Agreement, other than (i) sales contracts, supply contracts, purchase orders, distributorship agreements, agreements with brokers and sales representatives relating to sales of product and other commitments entered into in the normal and ordinary course of the conduct of business, none of which requires future expenditures by any party thereto of more than \$250,000 or has a term expiring more than one year after the date of this Agreement (a term will not be deemed to extend more than one year after the date of this Agreement in the event H. P. Smith has a right to cancel without penalty on or prior to the expiration of such one-year period), (ii) commitments for work under approved authorizations for expenditure and continuation of existing projects, and not exceeding \$50,000 individually or \$500,000 in the aggregate, and (iii) agreements with Phillips and/or direct and/or indirect subsidiaries and/or affiliates of Phillips relating to services provided to H. P. Smith and/or to distribution and marketing by H. P. Smith as a Phillips' subsidiary. Except as indicated on Exhibit E, all agreements, commitments and leases between H. P. Smith and Phillips or any subsidiary or other affiliate of Phillips will be terminated on or prior to the Closing

Date. There is no default, or event of default, or event which with notice or lapse of time or both would constitute a default or event of default on the part of H. P. Smith, or to the best knowledge of Sellers, the other party or parties thereto, under any agreement, commitment or lease of H. P. Smith except such as would not have a material adverse effect on the business of H. P. Smith. Except for insurance agreements, agreements relating to employee benefits, a computer lease, and an environmental corporate guarantee, with respect to which provision is made in Section 8, Section 9, Section 15A and Section 15I, respectively, in this Agreement, there are no agreements which Phillips or any subsidiary or other affiliate of Phillips has entered into with any third party for the express benefit of H. P. Smith. With respect to agreements between Phillips or any subsidiary or other affiliate of Phillips and any employee or former employee of H. P. Smith (including but not limited to any such agreement with such a person who is or becomes employed by Phillips or one of its subsidiaries or affiliates other than H. P. Smith) respecting confidential information of H. P. Smith obtained by such employee or former employee during their employment by H. P. Smith or respecting inventions and patent rights created as

part of their employment by H. P. Smith, the rights of Phillips or such subsidiary or affiliate under such agreements shall be assigned to H. P. Smith on or before the Closing Date, to the extent and only to the extent that such agreements relate to such confidential information of H. P. Smith and/or such inventions and patent rights created as part of their employment by H. P. Smith.

H. Directors, Officers, Salaries and Banks.

Lists of the directors and officers of H. P. Smith and of the salaries and compensation payable by H. P. Smith to its directors and officers, heretofore furnished to Buyer, are true and complete lists as of this date and H. P. Smith has no contracts or commitments with any of its directors, officers or employees respecting employment or tenure with H. P. Smith except as reflected on Exhibit F, true, complete and correct copies of which have heretofore been furnished to Buyer. The Executive Compensation Plan and the Incentive Compensation Plan of H. P. Smith have been terminated effective September 30, 1983, and final payments to the participants therein made, which payments did not in the aggregate exceed \$101,000.00. Sellers will furnish to Buyer the name of each bank in which H. P. Smith has an account, lock box and/or safe

deposit box and identify such of said accounts and/or boxes as will be closed on or before the Closing Date. Sellers have no knowledge of the existence of any tax or other power of attorney to act for or on behalf of H. P. Smith in any respect except those listed on Exhibit F.

I. Litigation.

Except for suits of a character incident to the normal conduct of H. P. Smith's business and involving not more than Fifty Thousand Dollars (\$50,000.00) in the aggregate, there is no litigation or proceeding pending, or to the best of Sellers' knowledge threatened, against or relating to H. P. Smith, its properties or business, nor do Sellers know or have reasonable grounds to know of any basis for any such action, or of any governmental investigation relative to H. P. Smith, its properties or business, except as disclosed on Exhibit G or otherwise disclosed in this Agreement. There is no litigation or proceeding pending, or to the best of Sellers' knowledge threatened, against H. P. Smith or either Seller which seeks to prohibit, restrict or delay consummation of the transactions contemplated hereby or fulfillment of any of the conditions hereto.

J. Other Accounts.

Phillips agrees on or as soon as practicable after the Closing Date to pay to H. P. Smith in full, by wire transfer of immediately available federal funds, all amounts owed by Phillips to H. P. Smith on intercompany accounts as of the Effective Time, and H. P. Smith will pay to Phillips, in like manner, all amounts owed by H. P. Smith to Phillips on intercompany accounts as of the Effective Time, except "trade accounts" representing purchases from Phillips or its subsidiaries of materials and supplies, which trade accounts will be paid by H. P. Smith within the usual terms applicable thereto, and Buyer agrees and consents that such payments will not be considered a distribution under Section 5D(3) above and will be considered under this Agreement as being in the usual and ordinary course of business.

K. Patents and Trademarks and Other Intellectual Property.

(1) All of the rights, title, and interest of either of Sellers or any subsidiary or other affiliate of either of them in and to all active (i.e., unexpired, not lapsed, etc.) United States and foreign patents, pending patent applications, inventions, trade secrets and proprietary processes and formulae, which relate to operations of H. P. Smith prior to the Closing Date and which had been owned or licensed to either of Sellers or any subsidiary or other affiliate of either of them ("Operations Knowhow"), shall be assigned to H. P. Smith on or before the Closing Date, to the extent the applicable inventions or other such knowhow were conceived by employees of H. P. Smith

during their employment by H. P. Smith or were acquired by or on behalf of H. P. Smith from a third party (collectively referred to as "Smith Knowhow"). The foregoing patents and patent applications are listed as Group 1 on Exhibit H-1.

(2) All of the rights, title, and interest of either of Sellers or any subsidiary or other affiliate of either of them in and to each of the United States patents listed in Group 2 on Exhibit H-1 and all active (i.e., unexpired, not lapsed, etc.) foreign patents and applications which correspond thereto shall be assigned to H. P. Smith on or before the Closing Date. All such active foreign patents and applications, if any, are listed in Group 2 on Exhibit H-1.

(3) By the Closing Date, all current license agreements, if any (and there are no such agreements of which Sellers are aware), under which either of Sellers licenses a third party to practice the aforesaid Smith Knowhow or to use any "Smith Marks" or any "Smith Copyrights" (as hereinafter defined) will be assigned to H. P. Smith.

(4) Prior to the Closing Date, H. P. Smith agrees to grant, or cause to be granted, to Phillips and its wholly owned subsidiaries an irrevocable, royalty-free, non-transferable license to make, use and/or sell under each patent listed in Group 2 on Exhibit H-1.

(5) Prior to the Closing Date, Phillips agrees to grant, or cause to be granted, to H. P. Smith an irrevocable, royalty-free, non-transferable (except as provided in Section 5K(10)) license to make, use and/or sell under each patent listed in Group 3 on Exhibit H-1.

(6) Prior to the Closing Date, Sellers agree to grant, or cause to be granted, to H. P. Smith an irrevocable, royalty-free, non-transferable (except as provided in Section 5K(11)) immunity from suit by Sellers or either of them based on any operations or products of H. P. Smith (whether practiced or produced before or after the Closing Date) which are the same as those commercially practiced or produced by H. P. Smith in the regular conduct of its business at any time prior to the Closing Date, constituting either (a) an infringement of any patent of Sellers which is directed to an invention

conceived prior to the Closing Date or (b) a use of Operations Knowhow or (c) an infringement of any copyright of Sellers originated prior to the Closing Date; provided, however, that such immunity shall not extend to the polymerization of one or more olefinic monomers to produce polyolefins or to the resulting virgin polyolefin; provided further, however, that any immunity from suit, to which H. P. Smith is entitled under this provision concerning any operation or product of H. P. Smith, shall not be lost merely because such operation or product is subsequently modified, but the scope, except for changes in volume of production, of such immunity from suit shall not be increased by such modification.

(7) All of the rights, title and interest of either of Sellers or any subsidiary or other affiliate of either of them in and to all copyrights, if any, trademarks and service marks, if any, which were originated by or on behalf of H. P. Smith as opposed to either of Sellers and which had been owned by or licensed to either of Sellers or any subsidiary or other affiliate of either of them (herein referred to as "Smith Marks" or "Smith Copyrights" as the case may be) have been assigned to H. P. Smith. The foregoing Smith Marks and Smith Copyrights, if any, are listed in Exhibit H-2.

(8) To the best knowledge of Sellers, H. P. Smith owns or is licensed or otherwise has all reasonably necessary rights to use all patents, trademarks, service marks, trade names, copyrights, inventions, trade secrets, proprietary processes and formulae, applications for patents, trademarks, and copyrights, and other industrial and intellectual property rights (collectively, the "Intellectual Property") used in and materially necessary for the conduct of the business of H. P. Smith as conducted on the date hereof. To the best knowledge of Sellers, no Intellectual Property presently used by H. P. Smith infringes in any material way on any valid rights owned or held by any other persons other than Sellers. There is no pending or, to the best knowledge of Sellers, threatened claim or litigation against H. P. Smith, contesting its right to use any Intellectual Property.

(9) Sellers agree, upon the request of Buyer or H. P. Smith, to do, execute, acknowledge, deliver,

or file all such further acts, transfers, assignments, or agreements as may be reasonably required for the transfer or the completion of the transfer from Sellers to H. P. Smith of the patents, trademarks, copyrights, and know-how to which H. P. Smith is entitled under this Agreement.

(10) The license under Section 5K(5) shall be assignable by H. P. Smith subsequent to the Closing Date concurrent with a transfer, whether by merger, consolidation, sale of assets, or otherwise, of the business in which the license is used. H. P. Smith may grant sublicenses under its license under Section 5K(5), without accounting to Sellers, to Buyer and/or any wholly owned subsidiary of Buyer. H. P. Smith may assign its rights and obligations under its license under Section 5K(5), without accounting to Sellers, to Buyer and/or any wholly owned subsidiary of Buyer. H. P. Smith shall promptly notify Phillips in writing of each assignment or sublicense made under the provisions of this Section 5K(10).

(11) The immunity from suit under Section 5K(6) shall be assignable by H. P. Smith subsequent to the Closing Date concurrent with a transfer, whether by merger, consolidation, sale of assets or otherwise, of the business in which the immunity from suit is used, where the use by H. P. Smith's transferee is substantially the same, except for changes in volume of production, as the use by H. P. Smith and where the use by H. P. Smith's transferee would otherwise infringe one or more of Seller's rights covered by the immunity from suit if not so transferred. The immunity from suit under Section 5K(6) may be extended by H. P. Smith, without accounting to Sellers, to operations practiced after the Closing Date and/or products produced after the Closing Date by Buyer and/or any wholly owed subsidiary of Buyer, to the extent and only to the extent (except for changes in volume of production) that such operations and/or products of Buyer and its wholly owned subsidiaries are the same as those commercially practiced or produced by H. P. Smith in the regular conduct of its business at any time prior to the Closing Date, provided further, however, that any immunity from suit, to which Buyer or any of its subsidiaries is entitled under this provision shall not be lost merely because such operation or product is subsequently modified, but the scope, except for changes in volume of

production, of such immunity from suit shall not be increased by such modification. H. P. Smith shall promptly notify Phillips in writing of each assignment or extension made under the provisions of this Section 5K(11).

L. Revenue Bond Transactions - No Default.

H. P. Smith and Phillips have to date performed and complied in all material respects with all of their obligations, commitments and undertakings in respect of the industrial revenue bond transactions referred to in Section 10 below, neither H. P. Smith nor Phillips is in default thereunder, and no condition or event exists or will exist as of the Closing Date which violates or results in the breach of any of the terms, conditions or provisions of any of the agreements or other instruments in respect thereof to which either H. P. Smith or Phillips is a party or by which either is bound, or which constitutes a default or with notice or lapse of time or both would constitute a default or would permit the acceleration of any obligation of either H. P. Smith or Phillips thereunder.

M. Licenses, etc.

To the best of Sellers' knowledge, H. P. Smith has, or will have as of the Closing Date, all licenses and permits necessary for the operation of its business as presently conducted, with the possible exception of an Iowa permit for disposal of wastes from the Iowa City

plant, request for which has been made to the appropriate office(s), and Sellers have no knowledge or notice of any non-compliance by H. P. Smith with any law, rule, ordinance, regulation or order applicable to the operation of the business of H. P. Smith except as otherwise disclosed in writing to Buyer.

N. Agreement Not a Breach.

The fulfillment, performance and compliance with the terms and provisions and the consummation of the sale under this Agreement do not and will not conflict with, violate or result in the breach of the terms, conditions, or provisions of, or with or without notice or lapse of time constitute a default under, or permit the acceleration of any obligation under or permit the termination of, any contract, indenture, agreement, note, covenant, restriction or other instrument to which H. P. Smith and/or either Seller is a party or by which any of them may be bound, nor violate the provisions of the Articles of Incorporation and/or By-Laws of H. P. Smith and/or of either of Sellers, nor to the best of Sellers' knowledge conflict with, or violate the provisions of any law, rule, regulation, order, judgment or decree binding on H. P. Smith and/or either of Sellers.

O. Disclosure.

To the best knowledge of Sellers, no representation or warranty by Sellers in this Agreement contains any untrue statement of a material fact, or omits to state a material fact necessary to make the statements contained herein not misleading.

P. Access and Information.

Sellers will cause H. P. Smith to give to Buyer and to Buyer's counsel, accountants, engineers and other representatives full access, during normal business hours throughout the period prior to the Closing Date, to all of H. P. Smith's properties, books, contracts, commitments and records, and to furnish Buyer during such period with all such information concerning H. P. Smith's affairs as Buyer reasonably may request.

Q. No Subsidiaries.

H. P. Smith does not own, of record or beneficially, any capital stock of or other proprietary interest in, directly or indirectly, any corporation, association, trust, partnership, joint venture or other entity.

R. Labor Relations.

Exhibit I sets forth a complete and correct list of each collective bargaining agreement covering employees of H. P. Smith. There are no controversies

pending between H. P. Smith and its employees which (i) affect or can reasonably be expected to affect, materially or adversely, the business of H. P. Smith or (ii) relate to any effort to prevent, restrict or delay consummation of the transactions contemplated by this Agreement.

S. Authority of Sellers.

Phillips and Foundation are, and will be on the Closing Date, corporations duly organized, validly existing and in good standing under the laws of the State of Delaware and the State of Oklahoma, respectively. All corporate action on the part of Sellers has been taken to properly authorize the execution of this Agreement on behalf of Sellers and the consummation of the sale of the Stock in accordance herewith, and this Agreement has been validly executed and delivered by Sellers and constitutes the valid and binding obligation of Sellers enforceable against them in accordance with its terms. Sellers shall furnish prior to closing a certified copy of all corporate resolutions required to fully so authorize or ratify this Agreement and the transactions contemplated hereby.

6. CONDUCT OF BUSINESS PENDING CLOSING.

Pending the closing hereunder, the business of H. P. Smith shall be conducted only in the ordinary and usual

course except as permitted in this Agreement; provided, however, that, except as permitted in this Agreement, without the written consent of Buyer: no change shall be made in the Articles of Incorporation or By-Laws of H. P. Smith nor any additional capital stock of H. P. Smith, or any security convertible into capital stock of H. P. Smith, issued; no option, warrant or other right to acquire capital stock of H. P. Smith shall be granted; no dividends or other distribution or payment shall be declared or made in respect of the capital stock of H. P. Smith nor will H. P. Smith directly or indirectly redeem, purchase or otherwise acquire any of such stock; no increase shall be made in the compensation payable or to become payable by H. P. Smith to any of its directors, officers, employees or agents nor shall any bonus payment or arrangement be made by H. P. Smith to or with any of said persons, except as may be required under the terms of existing commitments or arrangements listed in Exhibit F and/or Exhibit I and for which H. P. Smith becomes obligated thereunder; no contract or commitment in the ordinary course of business shall be entered into by or on behalf of H. P. Smith extending beyond December 31, 1983, except normal commitments for the purchase of raw materials and supplies necessary for continued operation of the business and acceptance of orders for goods not requiring expenditures by any party thereto in excess of \$250,000, and commitments for maintenance, repair, work under approved authorizations for expenditure and continuation of

existing projects not exceeding \$50,000 individually or, when combined with such commitments existing on the date hereof, \$500,000 in the aggregate; no change shall be made affecting the personnel, compensation payments, or banking and/or lock box and safe deposit arrangements referred to in Section 5H above, except as contemplated in said Section 5H, without Buyer's prior written approval; no sale or other disposition of any of the assets of H. P. Smith shall be made except in the ordinary course of business. Sellers will use their best efforts to, including causing H. P. Smith to use its best efforts to, preserve H. P. Smith's business organization intact and keep available to H. P. Smith the services of its present employees, and preserve for H. P. Smith the goodwill of its suppliers, customers and others having business relations with H. P. Smith. Buyer agrees that after Buyer has discussed with the present employees of H. P. Smith their continued employment with H. P. Smith and/or employment with Buyer, this provision does not prohibit, and will not be violated by Phillips discussing with, attempting to employ or making an offer of employment to, any such employee who has, after Buyer's discussion with such employee, expressed an interest in possible employment other than with H. P. Smith or Buyer.

7. INCOME TAXES.

H. P. Smith has been, and through the Effective Time will be, a consolidated subsidiary of Phillips only for U.S.

income tax purposes. H. P. Smith has prepared and filed and/or will prepare and file, within the required filing time or permitted extensions thereof, proper state income and franchise tax returns for the year 1982 and all prior periods, and has paid or will pay when due, under permissible extensions of the due date, any state income and franchise taxes payable as a result of its operations for such years and prior periods. Phillips has prepared and filed and/or will prepare and file proper U.S. income tax returns on H. P. Smith for the year 1982 and the short tax period of 1983 through the Effective Time. To enable Phillips to do so, H. P. Smith shall, and Buyer will cause H. P. Smith to, prepare or cause to be prepared a U.S. tax return for the short tax period of 1983 through the Effective Time, consistent with past separate basis returns prepared by H. P. Smith, and submit same to Phillips for review no later than December 15, 1983. Sellers agree to pay, on behalf of H. P. Smith, any U.S. income taxes, not at the Effective Time already paid, which are payable to the U.S. Treasury as a result of H. P. Smith's operations for both such tax periods. Amounts equal to amounts accrued in accordance with generally accepted accounting principles on a basis consistent with such accruals in prior years and remaining on H. P. Smith's books at the Effective Time for U.S. income taxes currently payable for said tax periods will be paid by H. P. Smith to Sellers. State and/or U.S. tax refunds or credits, resulting from any tax audit or otherwise,

with respect to tax periods prior to the year 1983, and with respect to U.S. income taxes for the short tax period of 1983 through the Effective Time, shall inure to the benefit of Sellers and the amounts thereof received by H. P. Smith, or by which subsequent tax liability, if any, of H. P. Smith would be reduced thereby, shall be promptly paid to Phillips by H. P. Smith upon receipt of such refund or utilization of such credit; provided however that to the extent, if any, such refunds or credits with respect to any period before the Effective Time shall result from carrybacks generated by H. P. Smith after the Effective Time, such refunds or credits shall inure to the benefit of H. P. Smith and the amounts thereof received by Sellers, or by which the tax liability of either of them for any such prior period shall be reduced thereby, shall be promptly paid to H. P. Smith by Phillips upon receipt of such refund or utilization of such credit. Buyer agrees to such payments, that same will not be considered a distribution under Section 5D(3) above and will be considered under this Agreement as being payments in the ordinary and usual course of business and will take and/or cause to be taken any action requested by Sellers to properly effect such payments.

Any and all H. P. Smith U.S. income tax returns for periods after the Effective Time and state income and franchise tax returns for periods after 1982 shall be filed by and be the responsibility of H. P. Smith and/or Buyer, and any U.S. income

taxes accrued after the Effective Time and state income or franchise taxes for periods after 1982 shall be the liability of and paid by H. P. Smith and/or Buyer, except that for the period January 1, 1983, through the Effective Time, neither H. P. Smith nor Buyer shall be liable for any deficiencies in state income or franchise taxes that are attributable to the inclusion of H. P. Smith in a combined, consolidated or unitary return that has been, should have been, will be or shall be filed with Phillips. For all purposes of this Agreement a "state" tax shall include a tax imposed by any political subdivision of a state.

8. H. P. SMITH'S INSURANCE.

A. Liability and Property Damage.

H. P. Smith does not maintain any separate liability insurance, for either special liability or general liability coverage, or insurance on its assets and equipment, except as reflected in Section 8B below and Policy No. GL-1280810 issued by the Home Indemnity Company of Manchester, New Hampshire, with a one-year term ending April 19, 1984, maintained in compliance with obligations of H. P. Smith under the lease from the Village of Bedford Park on parking area. Such insurance coverage for H. P. Smith is provided under policies and/or agreements maintained by Phillips for itself and subsidiaries. At the Closing Date Phillips will cause H. P. Smith to be removed from the coverage, as to all

events occurring after the Effective Time, of all such policies and agreements of every kind under which it is presently covered. General liability insurance coverage of H. P. Smith has been so maintained at all times from December 21, 1962, to date and will be continued through the Effective Time, subject to various deductible amounts listed on Exhibit J hereto. Phillips represents, warrants and agrees that such insurance, subject to policy terms and conditions and such applicable deductibles, covers all claims which H. P. Smith may become legally obligated to pay which arise out of accidents or occurrences which happened during the respective periods the policies were in force, subject to the terms of coverage defined above. In the event that any claim or suit is brought against H. P. Smith based upon an accident or occurrence covered by any such policies maintained by Phillips for itself and subsidiaries, Phillips agrees to cooperate with and to assist H. P. Smith in preparing and filing a claim against the appropriate insurer(s) and in collection of all insurance proceeds that may become payable by said insurer(s) with respect to such claim or suit; provided, however, H. P. Smith shall bear its expenses in connection therewith and shall reimburse Phillips for

Phillips' out-of-pocket expenses in connection therewith.

B. Workers Compensation.

Self-insurance permits for workers compensation are maintained in the name or on behalf of H. P. Smith in the States of Florida, Illinois and Iowa. With respect thereto, in the States of Illinois and Iowa, Phillips has given its guarantee of H. P. Smith's obligations under the self-insurance permits. Each of the above-named states will be notified that effective as of the Closing Date H. P. Smith is no longer a subsidiary of Phillips and that the Phillips guarantees in Illinois and Iowa are cancelled effective as of the Effective Time. Buyer understands that said self-insurance permits will be effectively cancelled as of the Effective Time. In the States of California, Michigan, Minnesota, Missouri, North Carolina, Pennsylvania and Texas, workers compensation insurance for H. P. Smith is provided under policies maintained by Phillips for itself and subsidiaries. Phillips will also cause H. P. Smith to be removed, as of the Effective Time, from the coverage of said workers compensation policies. In the State of Ohio, H. P. Smith is covered for workers compensation risks under the Ohio State Insurance Fund Scheme. On or prior

to the Closing Date, Buyer and Phillips agree to execute, effective as of the Effective Time, such transfer or other document as may be requested by Ohio for the purpose of continuing the coverage of H. P. Smith under said Fund after the Effective Time.

9. H. P. SMITH'S EMPLOYEE BENEFIT PLANS.

Sellers represent and warrant as follows:

Exhibit K sets forth a complete and correct list of each pension, profit sharing, insurance, welfare or other employee benefit plan within the meaning of Section 3(3) of the Employee Retirement Income Security Act (ERISA) currently maintained by H. P. Smith (collectively herein referred to as "Benefit Plans"). A true and complete copy of each such plan, including underlying trust agreements and related current actuarial valuation reports, if any, for defined benefit plans, has been delivered to Buyer.

With respect to each of those plans of H. P. Smith which constitute an employee pension plan within the meaning of Section 3(2) of ERISA, (herein referred to as "Pension Plans"), Sellers represent and warrant that:

(1) favorable determination letters have been received from the U. S. Internal Revenue Service (the "IRS") establishing the tax qualified status, under Code Section 401(a), of such plans, as amended, which letters are dated July 14, 1980, as to both the H. P. Smith Paper Co. Salaried Retirement Plan and the H. P. Smith Paper Co. Hourly Retirement Plan and July 15, 1980, as to the Employee Savings and Investment Plan and Trust Agreement of H. P. Smith Paper Co., and said letters have not been revoked;

(2) to the best knowledge of Sellers, none of such plans has engaged in or been a party to any prohibited transactions (as defined in Section 4975 of the Code or Section 406 of ERISA);

(3) there was no accumulated funding deficiency within the meaning of Section 412 of the Code or Section 302 of ERISA with respect to the Pension Plans as of January 1, 1983;

(4) no reportable event has occurred within the meaning of Title IV of ERISA;

(5) H. P. Smith does not participate, and has never participated, in any multiemployer pension plan as defined in Section 414(f) of the Code and Section 3(37) of ERISA, and no withdrawal liability within the meaning of Section 4201 of ERISA has been asserted against H. P. Smith by any multiemployer pension plan as defined in Section 414(f) of the Code and Section 3(37) of ERISA;

(6) no plan of H. P. Smith covered by Title IV of ERISA has been terminated since September 2, 1974, and no material liability to the Pension Benefit Guaranty Corporation has been or is expected to be incurred prior to the Closing Date;

(7) no litigation is pending or to the best knowledge of Sellers threatened against any plan seeking the payment of benefits or alleging a breach of trust or fiduciary duty by any plan fiduciary unless such litigation is listed on Exhibit G; and

(8) Phillips shall execute such riders and/or documents and/or take such actions as may be reasonably required of Phillips to effectively, as of the Effective Time, (i) remove H. P. Smith as an Employer Member from group annuity contracts GR-12266 and GR-9066 between The Travelers Insurance Company and Phillips (the "GAC's"), and (ii) transfer, pursuant to the terms of the GAC's, the assets of the Pension Plans held in Accounts Nos. 1 and 2 of GR-12266 and Account No. 1 of GR-9066, to such other funding agent(s) as may be designated by H. P. Smith.

The H. P. Smith Pension Plans have been amended since the date of the last respective favorable IRS determination

letters received for such plans (the "Amendments"). Additional modifications (the "Modifications") to the Pension Plans required, under the Tax Equity and Fiscal Responsibility Act of 1982 (herein referred to as "TEFRA"), to be effective as of January 1, 1983, have been adopted with respect to the Pension Plans. Sellers have caused applications for favorable determinations by the IRS (the "Applications") to be filed with respect to such Amendments (exclusive of the TEFRA Modifications referred to above). Buyer and Sellers agree that H. P. Smith shall, whether before or after the Closing Date, timely take such action and/or execute such documents as Phillips may deem necessary and/or appropriate to further effect such Amendments and said TEFRA Modifications, and to take such other actions to preserve the tax qualified status of the Pension Plans for all taxable years (i) for which favorable determination letters have not been received from the IRS, and (ii) during any part of which Phillips owned the Stock, including but not limited to such further action with respect thereto as may be required by IRS and agreed to by Phillips as a condition to the issuance of such favorable IRS determinations, and Sellers and/or Buyer, as the case may be, shall cause H. P. Smith to take such action and/or execute such documents; provided, however, that in no event shall any such actions be taken and/or documents be executed by H. P. Smith without the prior consent of Buyer, which consent shall not be unreasonably withheld. Phillips agrees to prepare, on behalf and in the name of H. P. Smith, the necessary documentation

and advise H. P. Smith of action on its part required in connection with said Amendments, said Applications and said TEFRA Modifications, including any Summary Plan Descriptions or Summaries of Material Modifications required for H. P. Smith to be, as of the Effective Time, in compliance with legal requirements with respect to the Pension Plans. Such further action, if any, required by IRS which is to be taken shall be completed prior to or as soon after the Closing Date as reasonably possible. Buyer and/or H. P. Smith shall be responsible for preparing and filing applications for favorable determinations by the IRS with respect to said TEFRA Modifications and agree to timely do so.

With respect to each of those plans of H. P. Smith which constitute an employee welfare plan within the meaning of Section 3(1) of ERISA (herein referred to as "Other Plans"), Sellers represent and warrant that such plans have been established and are in compliance with applicable requirements of ERISA, except the H. P. Smith Paper Co. Medical Plan, including the dental plan part thereof, to which written amendments must be and are being made.

Phillips also agrees to prepare for and provide to H. P. Smith, as soon as possible after the Closing Date, additional documentation, if any, including any Summary Plan Descriptions or Summaries of Material Modifications, necessary for H. P. Smith to be, as of the Effective Time, in compliance with legal requirements with respect to the Other Plans.

Except as otherwise specifically provided in this Section 9, from and after the Closing Date, Buyer and/or H. P. Smith shall be solely responsible for required changes in the Benefit Plans, if any, and Sellers shall have no responsibility for or in respect of any such changes, and Buyer and/or H. P. Smith shall be solely responsible for all changes in the Benefit Plans, if any, required as a result of the Supreme Court decision in the case of Arizona Governing Committee for Tax Deferred Annuity and Deferred Compensation Plans v. Norris, 103 S.Ct. 3492 (1983), and Sellers shall have no responsibility for or in respect of any such changes.

10. REVENUE BOND TRANSACTIONS.

H. P. Smith is a party to industrial revenue bond transactions relating to both its Chicago Plant and its Iowa City Plant. The agreements and other documents relating thereto to which H. P. Smith and/or Phillips is a party or by which either are bound, are listed on Exhibit D. Phillips will in accordance with the provisions of the various documents relating thereto be liable for the obligations of H. P. Smith thereunder in the event of breach or default by H. P. Smith in any respect.

Buyer covenants and agrees at Phillips' request to cooperate in all reasonable respects with Phillips, both before and after the Closing Date, and after the Closing Date to cause H. P. Smith to cooperate in all reasonable respects with Phillips, in an effort to cause Buyer to be substituted for

Phillips and to obtain a full and complete release of Phillips from any and all obligations, commitments and liabilities on, under or with respect to both of said industrial revenue bond transactions, effective as of the Effective Time, and Buyer covenants and agrees, individually as to each of said transactions, to execute and deliver such assumption, guarantee, assurance and other documents in respect thereto as may be reasonably required respectively by the Village of Bedford Park, Illinois and the City of Iowa City, Iowa, the respective Trustees and/or Mortgagees and/or the respective Bondholders to effect such substitution of Buyer and release of Phillips with respect thereto; provided that Buyer's obligations and liabilities under any such assumption, guarantee, assurance or other document are no greater than Phillips' present obligations and liabilities under the applicable documents which are listed on Exhibit D. Unless and until such substitution for and release of Phillips has been effected, H. P. Smith shall, and Buyer agrees to cause H. P. Smith to, provide Phillips by certified mail, return receipt requested, with true and correct copies of all payment checks, certificates and other documents issued or delivered in compliance with the obligations of H. P. Smith with respect to the revenue bond documents on both the Iowa City Plant and the Chicago (Bedford Park) Plant, to be provided simultaneously with such issuance and/or delivery.

11. REPRESENTATIONS, WARRANTIES AND AGREEMENTS OF BUYER.

Buyer represents, warrants and agrees as follows:

A. Organization and Standing of Buyer.

Buyer is a corporation duly organized, existing and in good standing under the laws of the State of Virginia. A copy of Buyer's Articles of Incorporation, certified by the Virginia State Corporation Commission, and all amendments thereto to date and of the By-Laws of Buyer as amended to date, certified by the Secretary of Buyer, heretofore furnished by Buyer to Phillips are true, correct and complete copies of said Articles of Incorporation and By-Laws as amended, as of this date, and there have been, and before the Closing Date will be, no other amendments thereto.

B. Purchase for Investment.

Buyer's purchase of the Stock is being made for its own account for investment and with no present intention of further distribution or resale thereof.

C. Confidentiality.

All data and information heretofore or hereafter furnished to Buyer by H. P. Smith or Phillips, or any of the representatives of either, will remain proprietary and be kept confidential in accordance with

the terms of the Confidentiality Letter Agreement dated February 14, 1983, between Phillips and Buyer until the sale of the Stock hereunder has been closed, and in the event that for any reason the sale hereunder is not closed, Buyer will return to Phillips all such data and information, and any copies thereof made by or for Buyer, as provided in said Confidentiality Letter Agreement and will not use any of same, or its knowledge thereof, in any way detrimental to Phillips and/or H. P. Smith.

D. Agreement Not a Breach.

The fulfillment, performance and compliance with the terms and provisions and the consummation of the sale under this Agreement do not and will not conflict with, violate or result in the breach of the terms, conditions, or provisions of, or with or without notice and lapse of time constitute a default under, or permit the acceleration of any obligation under or permit the termination of, any contract, indenture, agreement, note, covenant, restriction or other instrument to which Buyer is a party or by which Buyer may be bound, nor violate the provisions of the Articles of Incorporation and/or By-Laws of Buyer, nor, to the best of Buyer's knowledge, conflict with, or violate the provisions of

any law, rule, regulation, order, judgment or decree binding on Buyer.

E. Litigation.

There is no litigation or proceeding pending, or to the best of Buyer's knowledge threatened, against Buyer which seeks to prohibit, restrict or delay consummation of the transactions contemplated hereby or fulfillment of any of the conditions hereto.

F. Authority of Buyer.

Buyer is, and on the Closing Date will be, a corporation duly organized, validly existing and in good standing under the laws of the State of Virginia. All corporate action on the part of Buyer has been taken to properly authorize the execution of this Agreement on its behalf and the consummation of the purchase of the Stock in accordance herewith and this Agreement has been duly and validly executed and delivered by Buyer and constitutes the valid and binding obligation of Buyer enforceable against it in accordance with its terms. Buyer shall furnish prior to Closing a certified copy of all corporate resolutions required to fully so authorize this Agreement and the transactions contemplated hereby.

12. SELLERS' INDEMNIFICATION.

From and after the Closing Date, Sellers further agree as follows with respect to the matters set forth below:

A. Taxes.

To indemnify and hold harmless H. P. Smith from and against all income tax (including state income and franchise taxes) assessments against H. P. Smith for any period prior to the year 1983, and for U.S. income taxes only for that portion of 1983 through the Effective Time, and to handle at Sellers' expense, on behalf of H. P. Smith and in its name, any tax audit, including any administrative or judicial proceeding in respect thereof, and to indemnify and hold harmless H. P. Smith from and against all other taxes, due on or before the Effective Time, on the property or arising out of the business of H. P. Smith, and to handle at Sellers' expense, on behalf of H. P. Smith and in its name, with respect to such other taxes, any tax audit, including any administrative or judicial proceeding in respect thereof. No settlement of any tax audit or other tax proceeding shall be effected by Sellers on behalf of H. P. Smith which could reasonably be expected to have an effect on tax liability of H. P. Smith for any tax period subsequent to the short tax period of 1983 through the Effective Time as to U.S. income taxes, and subsequent to the year 1982 as to other taxes, unless Sellers have first notified H. P. Smith of the prospective settlement so that H. P. Smith has the

opportunity to participate in the settlement process for the protection of its interests; and if H. P. Smith shall notify Sellers that it is assuming, at its expense, the conduct of the audit to the extent it relates to items that could reasonably be expected to have such an effect, H. P. Smith shall be entitled to do so, provided that no settlement of any audit so assumed shall be effected without the concurrence of Sellers in such settlement. Buyer and H. P. Smith shall make available to Sellers, or if H. P. Smith elects to assume the conduct of an audit pursuant to the preceding sentence, Sellers will make available to H. P. Smith, any and all records necessary for Sellers or H. P. Smith, as the case may be, to properly evaluate, handle and defend such tax audits, assessments, or proceedings, and Buyer and/or H. P. Smith shall execute the documents necessary for Sellers or H. P. Smith, as the case may be, to do this and to keep Sellers currently advised of any such activity in this area. For the purposes of this Section 12A and of Section 13A, the terms "tax" and "tax liability" shall include any applicable interest and penalties.

B. Unitary Return Inclusion.

To indemnify and hold harmless H. P. Smith from and against liability for any deficiencies in state

income or franchise taxes for periods after 1982 that are attributable to the inclusion of H. P. Smith in a combined, consolidated or unitary return that has been, should have been, will be or shall be filed by Phillips.

C. Litigation and Claims.

To indemnify and hold harmless H. P. Smith, and to handle in H. P. Smith's name and on its behalf, the litigation, claims and workers compensation claims disclosed on Exhibits B and G, and any other workers compensation claims for injuries sustained prior to the Effective Time and asserted against H. P. Smith within one (1) year after the Effective Time.

D. Other Litigation.

To indemnify and hold harmless H. P. Smith from and against any liability arising out of personal injury, disease or death, herein individually referred to in this Section 12D as "Event", arising out of the manufacture or sale by H. P. Smith of the product manufactured by H. P. Smith at its Chicago Plant which utilized a paper feedstock containing some asbestos, or arising out of exposure on the premises of H. P. Smith prior to the Effective Time to said product or materials used in the manufacture thereof, provided the injury, manifestation or death occurs within twenty (20) years after the Effective Time and, with respect

to death, claim therefor is asserted within three (3) years of such death; provided, however, for any such Event as may be covered and insured by any policy of insurance in the name of H. P. Smith, as insured, and in force at any time prior to the Effective Time, or by any policy of insurance referred to in Section 8A of this Agreement provided for H. P. Smith since December 21, 1962, Sellers' obligation hereunder shall be reduced by the amount of any insurance proceeds paid under any such insurance as a result of such Event. The product referred to in this Section 12D is the type of product which was manufactured by H. P. Smith prior to the acquisition by Phillips of the stock of H. P. Smith.

Should any such Event occur which may be covered and insured by any policy of insurance in the name of H. P. Smith, as insured, Buyer and H. P. Smith, with the cooperation and assistance of Phillips, agree to prepare, file and diligently pursue under applicable insurance coverage a claim against the appropriate insurer(s) and to collect all insurance proceeds that may become payable by said insurer(s) with respect to such Event; provided, however, H. P. Smith shall bear its expenses in connection therewith and shall

reimburse Phillips for Phillips' out-of-pocket expenses in connection therewith.

Should any such Event occur which may be covered and insured by any policy of insurance referred to in Section 8A of this Agreement provided for H. P. Smith since December 21, 1962, notwithstanding any provisions of such Section 8A to the contrary, Buyer and H. P. Smith agree to cooperate with and to assist Phillips in preparing and filing a claim against the appropriate insurer(s) and in collection of all insurance proceeds that may become payable by said insurer(s) with respect to such Event; provided, however, Phillips shall bear its expenses in connection therewith and shall reimburse H. P. Smith and Buyer for their out-of-pocket expenses in connection therewith.

E. Benefit Plans.

In the event that the Amendments referred to in Section 9 above, or any of them, require any action to restore rights or benefits of former or present employees under the Pension Plans to levels they would have attained had the Amendments been adopted on or prior to the date as of which they are required to be effective, then Sellers agree to reimburse H. P. Smith for any cost of such restoration, applicable to periods prior to the Effective Time, which are incurred by

H. P. Smith, if any, in excess of the assets of the Pension Plans available for application to such restoration.

F. Representations and Warranties, etc.

To indemnify and hold harmless Buyer from and against any loss or damage resulting from any breach of the representations, warranties and agreements of Sellers, or the agreements of H. P. Smith to be performed before the Closing Date, contained in this Agreement.

G. Other.

To indemnify and hold harmless H. P. Smith and Buyer, and each of them, from and against any and all claims, demands, actions, proceedings, judgments, settlements, costs and legal and other out-of-pocket expenses incident to any matter covered by the provisions of Sections 12A, B, C, D, E and F above. Sellers shall have no liability or obligation under this Section 12 unless: (1) Buyer shall have given prompt written notice to Sellers of any assertion of liability by a third party which could reasonably be expected might give rise to a claim by Buyer or H. P. Smith against Sellers under this Section 12; and (2) upon Sellers having agreed in writing that they are obligated so to indemnify with respect thereto, Sellers have been allowed exclusive direction and control of the handling, defense and/or

settlement of any action, suit, proceeding or other claim to which the provisions of this Section 12 apply, without any interference by Buyer, H. P. Smith or any other person or entity on behalf of either or claiming rights under or through either of them, other than participation in any tax settlement process as contemplated in Section 12A above; provided that Sellers shall not make any settlement of any claims, other than settlements involving only the payment of money or other satisfaction which does not affect H. P. Smith or Buyer, or the business or assets of either of them, without the written consent of Buyer, which consent shall not be unreasonably withheld. Without limiting the generality of the foregoing, it shall not be deemed unreasonable to withhold consent to a settlement involving injunctive or other equitable relief against H. P. Smith or Buyer or their respective assets, employees or businesses.

13. BUYER'S INDEMNIFICATION.

From and after the Closing Date, Buyer further agrees as follows with respect to the matters set forth below:

A. Taxes.

To indemnify and hold harmless Sellers, and each of them, from and against any liability for any tax imposed upon either or both of Sellers attributable to the Buyer and/or H. P. Smith electing or being deemed to have elected the provisions of Section 338 of the

Internal Revenue Code of 1954 and the regulations thereunder as in effect at the Closing Date.

B. Benefit Plans.

Subject to the provisions of Section 12E above, Buyer agrees to indemnify and hold harmless Sellers from and against any and all claims and/or liabilities of any kind, which arise after the Effective Time, under or with respect to any of the Benefit Plans or to any participant(s) thereunder.

C. Revenue Bond Transactions.

To indemnify and hold harmless Phillips from and against any and all liability arising after the Effective Time, under or by reason of the Loan Guaranty Agreement dated as of December 1, 1976, executed by Phillips for the benefit of the Village of Bedford Park, Illinois, and/or which may result from any breach or default by H. P. Smith after the Effective Time of any of its obligations under or by virtue of (1) the Assignment of Lease made and entered into the 13th day of October, 1969, between Phillips and H. P. Smith, by which Phillips assigned its interest in a lease dated as of May 1, 1969, between Phillips, as Lessee, and the City of Iowa City, Iowa, as Lessor, and (2) the First Supplemental Lease dated May 1, 1970, between Phillips

and the City of Iowa City, Iowa, and endorsed by H. P. Smith.

D. Representations and Warranties, etc...

To indemnify and hold harmless Sellers, and each of them from and against any loss or damage resulting from any breach of the representations, warranties, and/or agreements of Buyer or the agreements of H. P. Smith, to be performed after the Closing Date, contained in this Agreement.

E. General.

To indemnify and hold harmless Sellers, and each of them, from and against any and all liabilities arising out of or based upon any debt, obligation contract, agreement or liability of or claim against H. P. Smith with respect to which Sellers have not indemnified H. P. Smith under this Agreement.

F. Other.

To indemnify and hold harmless Sellers, and each of them, from and against any and all claims, demands, actions, proceedings, judgments, settlements, costs and legal and other out-of-pocket expenses incident to any matter covered by the provisions of Sections 13A, B, C, D and E above.

Buyer shall have no liability or obligation under this Section 13 unless: (1) Sellers shall have given prompt written notice to

Buyer of any assertion of liability by a third party which could reasonably be expected might give rise to a claim by Sellers, or either of them, against Buyer under this Section 13; and (2) upon Buyer having agreed in writing that it is obligated so to indemnify with respect thereto, Buyer shall have been allowed exclusive direction and control of the handling, defense and/or settlement of any action, suit, proceeding or other claim to which the provisions of this Section 13 apply without any interference by Sellers or any other person or entity on behalf of either or claiming rights under or through either of them; provided that Buyer shall not make any settlement of any claims, other than settlements involving only the payment of money or other satisfaction which does not affect Sellers, or either of them, their respective businesses or assets, without the written consent of Sellers, which consent shall not be unreasonably withheld. Without limiting the generality of the foregoing, it shall not be deemed unreasonable to withhold consent to a settlement involving injunctive or other equitable relief against Sellers, or either of them, or their respective assets, employees or businesses.

14. RECORDS OF H. P. SMITH AFTER CLOSING.

A. Access by Sellers.

Buyer covenants and agrees that, after reasonable notice by Sellers to Buyer and to H. P. Smith, it will permit and cause H. P. Smith to

permit any authorized representative or representatives of Sellers to inspect, audit and make copies, during normal business hours, with respect to either periods of time before or after the Effective Time hereunder, of any and all of the books and records of H. P. Smith at any time or times following the Effective Time for the purpose of:

(1) preparing any and all tax returns referred to in Section 7 above or which Phillips may be required by law to make, either itself or on behalf of H. P. Smith, and/or of resolving and/or settling any tax audit or assessment by any governmental authority, including but not limited to preparing for and handling to conclusion any administrative or judicial proceeding in respect thereof;

(2) preparing, handling, defending and/or settling any suit and/or other matter to which the provisions of Section 12 above apply;

(3) for any other purpose necessary or appropriate to anything to be done or permitted to be done under this Agreement or relating to ownership of H. P. Smith prior to the Closing Date or relating to obligations of Buyer and/or H. P. Smith to Sellers under this Agreement.

B. Record Retention.

Buyer further agrees that it will not and will not permit H. P. Smith to destroy any books and records of H. P. Smith relating to periods before the Effective Time without written consent of Phillips; provided, however, in lieu of continuing to hold such books and records H. P. Smith may notify Phillips of its desire to destroy specified books and records and, in such event,

Phillips agrees that within sixty (60) days of receipt of such notice, Phillips will either authorize H. P. Smith to destroy such books and records or instruct H. P. Smith to return such books and records to Phillips, at Phillips' expense, to such locations as Phillips may direct. Phillips may also provide H. P. Smith, from time to time, with lists designated as "Legal Holds", and other information, relating to books and records of H. P. Smith relating to periods before the Effective Time in order to give guidance as to what books and records Phillips is under a legal obligation to retain as a result of its prior ownership of H. P. Smith; but the furnishing of such lists shall not increase the responsibility of Buyer and H. P. Smith under the first sentence of this Section 14B or under other provisions of this Agreement.

15. FURTHER COVENANTS AND AGREEMENTS.

A. Computer Lease.

H. P. Smith presently has an agreement dated July 23, 1982, with Phillips entitled "Equipment Lease Agreement" (the "Sublease"), a copy of which has been furnished to Buyer. This Sublease provides for the sublease to H. P. Smith by Phillips of certain computing equipment which is leased (the "Lease"), together with other computing equipment, by Phillips from Equilease

Marketing Corporation under lease dated July 23, 1982. Phillips and H. P. Smith have amended said Sublease by an Amendment dated as of September 30, 1983. Unless an assignment of the Lease, as referred to in said Amendment, has been made on or before April 15, 1985, Phillips agrees to terminate the Lease insofar as it covers the equipment under the Sublease and will cooperate with H. P. Smith and Buyer in their effort to acquire, by lease or otherwise, the equipment presently covered by the Sublease.

B. Transition Assistance.

In order to assist Buyer in the transition of the ownership of H. P. Smith, Phillips agrees, for a period not to exceed sixty (60) days following the Closing Date (the "Period"), to make or cause to be made available to H. P. Smith, if Buyer requests, the full time services of James A. Kinnebrew, W. B. Thompson, David Stoops and R. E. Michels, herein individually and collectively referred to as "Loaned Employees", each of whom will immediately after the Effective Time become employees of Phillips or a direct or indirect subsidiary of Phillips, herein referred to as "Phillips Employer", and each of whom will be and remain at all times during the Period the employee of their respective Phillips Employer. The services of each of the Loaned Employees,

if utilized, shall be continuous, not intermittent. For said services Buyer and/or H. P. Smith shall pay, in arrears, on the first day of each calendar month to the Phillips Employer of each Loaned Employee whose services are used by H. P. Smith a sum equal to 143% of the Loaned Employee's monthly salary with his Phillips Employer, prorated on a daily basis for services of less than a month, in each case in full payment for the cost of salary and benefits for the Loaned Employees. Services of any such Loaned Employee may be terminated by Buyer at any time during the Period by fifteen (15) days prior notice to Phillips. The Loaned Employees will be covered by the benefits and policies of their respective Phillips Employers except that each will observe the holiday policy of H. P. Smith.

Buyer and H. P. Smith agree, jointly and severally, to indemnify, defend and hold harmless Phillips and the respective Phillips Employers of the Loaned Employees from and against any and all claims, demands, actions, proceedings and judgments, of any nature whatsoever, and all costs and legal and out-of-pocket expenses incident thereto, asserted by or in favor of any person whomsoever, including Loaned Employees, arising out of or in any way connected with the performance of services by Loaned Employees for

H. P. Smith pursuant to this Section 15B, and whether or not resulting from the negligence of Loaned Employees. To the extent, if any, that Phillips and/or the Phillips Employer is reimbursed, under applicable insurance coverage, for any losses indemnified against under this Section 15B, Buyer and H. P. Smith shall not be obligated hereunder; provided, however, that notwithstanding the foregoing, Buyer and H. P. Smith shall be obligated to Phillips under this Section 15B in any case where the negligence of Buyer and/or H. P. Smith contribute to the loss and Phillips declines insurance reimbursement for the loss.

C. Medical Examinations.

It is expressly recognized that Phillips has caused periodic medical examinations to be available to certain present and retired employees of H. P. Smith who were in the employ of H. P. Smith during the period 1949 through 1960. Such employees and retired employees, and their status, are set forth on a list bearing the designation "9/14/83" in the upper right hand corner and furnished to Buyer on or about September 15, 1983. Buyer agrees, at its cost and expense, to cause such examinations to be made available to such employees and retirees, including those who hereafter retire or terminate, no less frequently than once every three

years with such examinations, as to each of the identified persons, to include a medical history, chest x-ray (PA and Lateral), spirometry (FVC and FEV, three or more trials of at least six seconds of maximum patient effort), and a stool Hemocult, and to annually advise the Medical Director of Phillips, in writing, the names of each of said persons who, during the preceding twelve (12) months, (1) had such examination, identifying any of such persons who were referred for consultation, and (2) was given the opportunity to have such examination but who did not have the examination.

D. Due Diligence.

Each of the parties will respectively exercise due diligence in efforts to cause to be satisfied the conditions to be complied with by each of them, respectively, as provided in this Agreement; in obtaining any and all consents, waivers, authorizations and approvals required on their part, respectively, for them to complete this transaction; in giving any notice or making any filing with any governmental agency in respect of this transaction which may be required to be given or filed by such party under any applicable law, rule or regulation; and, in executing and delivering all documents, instruments and copies thereof, necessary to

the other party, provided for herein or proper in carrying out the purpose of this Agreement.

E. Cooperation.

Buyer agrees to and to cause H. P. Smith to cooperate with and assist Sellers, and each of them, and Sellers, agree to cooperate with and assist Buyer and H. P. Smith in connection with any claim, dispute, action, proceeding, litigation, investigation, contest, tax or other governmental audit, or any other matter, based upon or arising in connection with any obligation, duty, contract, liability, claim or other matter relating to H. P. Smith for or with respect to which Sellers, or either of them, or Buyer or H. P. Smith, as the case may be, have any obligation under this Agreement or under any applicable law, rule or regulation, and to provide documentation, information and other assistance reasonably requested in connection with or relative thereto and not otherwise readily available.

F. Publicity.

None of the parties hereto will make, or cause to be made, and will use their best efforts to prevent their employees and agents from making or causing to be made, any public disclosure or publicity release pertaining to this Agreement, any information relating

thereto or the subject matter thereof, without the consent of the other parties to the exact text of such disclosure or release; provided, however, that notwithstanding the foregoing each party shall be permitted to make such disclosures to the public or to public or governmental agencies as may be deemed necessary by such party's counsel to comply with and prevent violation of applicable laws of either the United States or of any state thereof.

G. Acknowledgment of Buyer.

Buyer expressly acknowledges and agrees that it has made its own independent examination and investigation of the 1983 Statements and the Six Year Summary and of the assets, properties, books and records of H. P. Smith and has satisfied itself as to the correctness, adequacy, condition and extent thereof, and agrees that except for the representations and warranties specifically set forth in this Agreement, no representation or warranty of any kind or nature, whether legal, financial, or otherwise, relating to H. P. Smith, its business, condition or affairs has been made to Buyer by, or on behalf of, Sellers, and that except as herein specifically set forth Sellers make no representation or warranty, express or implied, as to the quality, condition or fitness of the assets of

H. P. Smith and same are sold on an "AS IS" basis. Buyer further hereby agrees that in the event the sale of the Stock is consummated hereunder, Buyer shall, at the Effective Time, accept the Stock and the books, records, contracts, obligations, liabilities, properties, assets and business of H. P. Smith in an "AS IS" condition and shall thereafter have no recourse whatsoever against Sellers, or either of them, in regard thereto except to the extent expressly provided in this Agreement.

H. Trademarks, etc., of Sellers.

In recognition of the fact that certain of the assets of H. P. Smith have imprinted thereon the name "Phillips Petroleum Company," the name "Phillips" or the trademarks, logotype and variations thereof relating thereto, as soon as practicable on and after the Closing Date, Buyer shall cause H. P. Smith to remove such names, trademarks and logotype from, or render such names, trademarks and logotype illegible on, all assets of H. P. Smith on which such names, trademarks or logotype are imprinted or legible; provided, however, that Buyer may sell or otherwise dispose of inventories of finished products and packaging materials on hand as of the Closing Date without complying with this Section 15H for a period not to exceed 12 months after

the Effective Time; and provided further that such removal or rendering illegible shall not be required with respect to assets which are not visible to public view. Except as provided in the preceding sentence, Buyer covenants and agrees that from and after the Effective Time, H. P. Smith shall have no rights to the use of and shall make no use of the name or any tradename or trademark of either Seller, or any affiliate or subsidiary of either Seller, or any abbreviations or initials thereof, or any insignia, shields or other identifying emblems of any said entities, and Buyer shall take and/or cause to be taken such action as may be necessary and/or appropriate to prevent any such use thereof by H. P. Smith.

I. Phillips' Environmental Guarantee - Iowa City.

H. P. Smith is listed with the Iowa Department of Water, Air and Waste Management ("Department"), formerly the Iowa Department of Environmental Quality, as owner or operator of a hazardous waste management facility at its Iowa City Plant under EPA Identification No. IAD 050691617. In accordance with applicable federal regulations under the Resource Conservation and Recovery Act ("RCRA") and Iowa state requirements, Phillips has undertaken, to the Department, by Corporate Guarantee for Closure or Post-Closure Care dated July 1, 1982 ("Guarantee"), to guarantee performance by

H. P. Smith of closure and post-closure care of said facility as required. On or as soon as practicable after the Closing Date, Phillips will terminate said Guarantee in accordance with the terms thereof. Buyer agrees that within ninety (90) days after the Closing Date, Buyer will either provide financial assurance in the name of H. P. Smith, or cause H. P. Smith to provide same, as specified in Subpart H of 40 CFR Parts 264 or 265, as applicable, and obtain written approval of such assurance from the Department Executive Director and/or the United States Environmental Protection Agency as applicable, or in lieu thereof take such action, or cause H. P. Smith to take such action, as may be required so that H. P. Smith is no longer required to comply with the applicable financial assurance requirements of Subpart H of 40 CFR Parts 264 and 265 for the above mentioned facility, so as, in either event, to relieve Phillips of any further obligation under or by reason of the Guarantee.

Buyer further agrees to indemnify and hold harmless Phillips from and against any and all liability, claims, demands, actions, proceedings, judgments, settlements, costs and legal and other out-of-pocket expenses arising from events that occur after the Effective Time under or by reason of the above mentioned Guarantee dated July 1, 1982.

J. Further Assurances.

From time to time, without further consideration, Sellers and each of them, will execute and deliver such documents to Buyer or H. P. Smith, as Buyer and H. P. Smith may reasonably request in order more effectively to consummate the transactions contemplated hereby, and Buyer and H. P. Smith will execute and deliver such documents to Sellers, or either of them, as Sellers may reasonably request in order more effectively to consummate the transactions contemplated hereby.

16. OBLIGATIONS OF H. P. SMITH.

By signing the Consent and Agreement appended to this Agreement, H. P. Smith acknowledges the provisions of this Agreement applicable to H. P. Smith and consents thereto and agrees to be bound by the terms and provisions thereof.

17. OBLIGATIONS OF THE PARTIES.

A. Of Buyer.

The obligations of Buyer to purchase the Stock under this Agreement are subject to the following conditions:

(1) That Sellers' representations and warranties in this Agreement were true in all material respects at the date hereof, and are true in all material respects at and as of the Closing Date as though same were made at and as of said time.

(2) That Sellers have performed and complied in all material respects with all of the terms,

conditions and agreements contained in this Agreement to be performed and complied with by them on or prior to the Closing Date.

(3) That Buyer has received a certificate dated as of the Closing Date of a Vice President of Phillips certifying, to the best of such officer's knowledge and belief, as to the satisfaction of the conditions set forth in (1) and (2) of this Section 17A.

(4) That Buyer shall not have been advised, in writing or by its legal counsel, that this Agreement and/or the consummation of the sale of the Stock hereunder is not legal or valid.

(5) That Sellers have, in writing, waived as a breach any events occurring after the date of this Agreement which have been disclosed to Sellers and would but for such waiver constitute a breach of the representations, warranties and agreements of Buyer and/or H. P. Smith contained in this Agreement.

(6) That Buyer shall have received an opinion from counsel to Phillips to the effect that:
(i) Phillips and Foundation are corporations duly organized, validly existing and in good standing under the laws of the State of Delaware and the State of Oklahoma, respectively, and each of them has full corporate power to enter into and perform this Agreement; (ii) this Agreement has been executed and delivered by Sellers and is a valid and binding obligation of Sellers enforceable against them in accordance with its terms, except (x) that such enforcement may be subject to bankruptcy, insolvency, reorganization, moratorium or other similar laws now or hereafter in effect relating to creditors' rights and (y) that the remedy of specific performance and injunctive and other forms of equitable relief are subject to certain equitable defenses and to the discretion of the court before which any proceeding therefor may be brought; (iii) H. P. Smith is a corporation duly organized, validly existing and in good standing under the laws of the State of Illinois, with total authorized capital stock of 5,000 shares of common stock having a par value of \$50.00 per share, of which only the Stock is issued and outstanding; and to the best knowledge of such counsel there are, except for this Agreement, no outstanding stock

warrants, options or rights to acquire any of the stock of H. P. Smith or any security convertible into such stock; (iv) Sellers have good title to the Stock, free and clear of all liens and encumbrances; (v) the instruments of transfer relating to the Stock are sufficient to transfer to Buyer good title thereto, free and clear of all liens and encumbrances; and (vi) the execution and performance of this Agreement does not and will not violate the provisions of the Articles of Incorporation or Bylaws of H. P. Smith or either Seller and, to the best knowledge of such counsel, does not and will not conflict with, violate or result in the breach of the terms, conditions, or provisions of, or with or without notice or lapse of time constitute a default under, or permit the termination of, any contract, indenture, agreement, note, covenant, restriction or other instrument to which H. P. Smith and/or either Seller is a party or by which any of them may be bound.

B. Of Sellers.

All obligations of Sellers under this Agreement are subject to the following conditions:

(1) That Buyer's representations and warranties in this Agreement were true in all material respects at the date hereof and are true in all material respects at and as of the Closing Date as though same were made at and as of said time.

(2) That Buyer has performed and complied in all material respects with all of the terms, conditions and agreements contained in this Agreement to be performed and complied with by it on or prior to the Closing Date.

(3) That Sellers have received a certificate dated as of the Closing Date of a Vice President of Buyer certifying, to the best of such officer's knowledge and belief, as to the satisfaction of the conditions set forth in (1) and (2) of this Section 17B.

(4) That Sellers have not been advised, in writing or by their legal counsel(s), that this Agreement and/or the consummation of the sale of the Stock hereunder is not legal or valid.

(5) That Buyer has, in writing, waived as a breach any events occurring after the date of this Agreement which have been disclosed to Buyer and would but for such waiver constitute a breach of the representations, warranties and agreements of Sellers contained in this Agreement, and any such waiver by Buyer shall constitute a waiver by and be binding upon H. P. Smith.

(6) That Sellers shall have received the opinion of McGuire, Woods & Battle, general counsel to Buyer, to the effect that: (i) Buyer is a corporation duly authorized, validly existing and in good standing under the laws of the State of Virginia and has full corporate power to enter into and perform this Agreement; (ii) this Agreement has been executed and delivered by Buyer and is a valid and binding obligation of Buyer enforceable against it in accordance with its terms, except (x) that such enforcement may be subject to bankruptcy, insolvency, reorganization, moratorium or other similar laws now or hereafter in effect relating to creditors' rights and (y) that the remedy of specific performance and injunctive and other forms of equitable relief are subject to certain equitable defenses and to the discretion of the Court before which any proceeding therefor may be brought; and (iii) the execution and performance of this Agreement does not and will not violate the provisions of the Articles of Incorporation or Bylaws of Buyer and, to the best knowledge of such counsel, does not and will not conflict with, violate or result in the breach of the terms, conditions, or provisions of, or with or without notice or lapse of time constitute a default under, or permit the acceleration of any obligation under or permit the termination of, any contract, indenture, agreement, note, covenant, restriction or other instrument to which the Buyer is a party or by which Buyer may be bound. In giving the opinion in clause (ii) above, such counsel may assume that the applicable laws of the State of Oklahoma are the same as the applicable laws of the State of Virginia.

18. SURVIVAL OF COVENANTS.

All statements, representations, warranties, covenants and agreements contained herein shall survive the closing hereunder.

19. GENERAL PROVISIONS.

A. Exhibits.

Exhibits A through K attached hereto are incorporated into this Agreement for all purposes to the same extent as if set forth herein at length.

B. Representative Capacities Only.

The respective officers of Buyer and of Sellers who execute this Agreement or any certificate or other instrument in connection herewith or in connection with the closing hereunder, are and will be doing so in their respective capacities as officers of their respective corporations, and not individually, and shall not be held personally liable to any of the parties hereto in connection with or in respect of any statement contained herein or in any such certificate or other instrument.

C. Brokers.

Each of the parties hereto represents that it has not retained any broker, finder, consultant or other agent whatsoever, or paid, or agreed to pay, any broker's or finder's fee or commission, or other compensation or remuneration, in connection with this

transaction, and will indemnify each of the other parties hereto against any claims or liability for any such fee, commission, compensation or remuneration of any broker, finder, consultant or other agent arising by reason or out of any understanding, arrangement, dealing or any other thing done by such party.

D. Expenses.

Each party hereto agrees to pay its own expenses in connection with this Agreement, the transaction hereunder and any other transaction or matters pursuant to or in connection with this Agreement, whether or not the sale of the Stock provided for herein is consummated.

E. Applicable Law.

This Agreement and the transaction hereunder shall be governed by and construed in accordance with the laws of the State of Oklahoma.

20. NOTICES.

Any notice, request, demand or other communication hereunder shall be in writing and shall be deemed to be properly given if delivered personally or sent by certified United States mail, postage prepaid, return receipt requested, addressed, as the case may be, to Sellers or to Buyer at their respective addresses shown herein. Notice given by mail shall be deemed

given on the date on which same is deposited in the United States mail in accordance with this provision.

21. SUCCESSORS AND ASSIGNS.

The terms, provisions and conditions of this Agreement shall be binding upon and inure to the benefit of the parties hereto, and, to the extent provided herein, H. P. Smith, and their respective successors and assigns; provided, however, that neither this Agreement nor any interest therein shall be assigned by Buyer or H. P. Smith without the written consent of Sellers or by Sellers without the written consent of Buyer, except that after the Effective Time such consent shall not be required in the event of an assignment to a transferee as a part of a transfer of all of the assets and liabilities of the assigning party; provided, however, the assigning party shall not be relieved of any of its obligations or liability under or by virtue of this Agreement by reason of any such assignment.

22. ENTIRETY OF AGREEMENT.

This Agreement sets forth the entire agreement and understanding of the parties in respect to the sale contemplated hereby, and supersedes for all purposes any and all prior agreements, arrangements and/or understandings relating to the subject matter hereof, and may be amended, modified, superseded or cancelled only by written instrument executed by each of the parties hereto.

23. INTERPRETATION AND HEADINGS.

The paragraph and subparagraph headings contained herein are for reference purposes only and do not constitute a part of this Agreement and shall not in any way affect the meaning or interpretation hereof.

IN WITNESS WHEREOF, Sellers and Buyer have executed this Agreement as of the day and year first above written.

ATTEST:

C. A. Cuthbert
Asst. Secretary

JAMES RIVER CORPORATION OF VIRGINIA

By *David J. McKittrick*
David J. McKittrick, Senior Vice
President, Chief Financial Officer

ATTEST:

J. C. Meese
Secretary

PHILLIPS PETROLEUM COMPANY

By *R. G. Askew*
R. G. Askew, Senior Vice President *gpk*

ATTEST:

J. C. Meese
Secretary

PHILLIPS PETROLEUM FOUNDATION, INC.

By *M. E. Kissell*
M. E. Kissell, President

CONSENT AND AGREEMENT

H. P. Smith Paper Co. ("H. P. Smith") hereby acknowledges the terms and provisions applicable to H. P. Smith in the foregoing Stock Purchase Agreement between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer, and does hereby consent to and agree to be bound by such terms and provisions.

EXECUTED as of the 12th day of October, 1983.

H. P. SMITH PAPER CO.

By

W. K. Shriver
W. K. Shriver, President *WKS*

ATTEST:

G. C. Meese
Secretary

EXHIBIT A

(consisting of three pages designated
respectively Exhibit A-1, A-2 and A-3)

Attached to and made a part of Stock Purchase Agreement
("Agreement") dated October 12, 1983, between Phillips Petroleum
Company and Phillips Petroleum Foundation, Inc., as Sellers, and
James River Corporation of Virginia, as Buyer.

H. P. Smith Paper Company
Balance Sheet
at June 30, 1983
(Unaudited)
\$'000

EXHIBIT A-1

Assets

Current Assets

Cash	\$ 43
Accounts Receivable (Less Allowance \$63)	5,754
Inventories (Less Reserve for LIFO \$4,122)	3,992
Prepaid Expenses & Other Current Assets	134
Total Current Assets	<u>\$ 9,923</u>

* Intercompany Receivables (Net)	1,111
Properties, Plants & Equipment	
Less Depreciation & Amortization	20,057
Deferred Charges	26
Total Assets	<u>\$31,117</u>

Liabilities

Current Liabilities

Accounts Payable	\$ 2,009
Long Term Debt due within One Year	280
Accrued Income & Other Taxes	324
Other Accruals	627
Total Current Liabilities	<u>3,240</u>

Long Term Debt	2,650
Other Long Term Liabilities	13
Deferred Income Taxes	3,536
Total Liabilities	<u>\$ 9,439</u>

Stockholder's Equity

Common Stock (\$50 par value)	
Shares authorized (5,000)	
Shares issued (2,400)	120
Capital in excess of Par Value of Common Stock	29
Earnings employed in the Business	
Beginning of year	20,893
Current Year	640
	<u>21,682</u>
Treasury Stock (50 shares)	4
Total Stockholder's Equity	<u>21,678</u>

Total Liabilities & Stockholder's Equity	<u>\$31,117</u>
--	-----------------

* Intercompany Receivables (Net) consist of:

H. P. Smith cash held by Phillips Petroleum Company	5,493
Long Term Advances from Phillips Petroleum Company	(4,157)
	<u>\$ 1,336</u>

Due to Phillips Petroleum Company for services	(11)
Due to Phillips Chemical Company for services	(23)
Due to Phillips Chemical Company - Plastics Branch for resins (trade account)	(191)
	<u>\$ 1,111</u>

H. P. Smith Paper Company
Statement of Income
\$'000

	Six Months Ended June 30	
	<u>1983</u>	<u>1982</u>
<u>Revenues</u>		
Sales and other operating revenues	<u>\$25,173</u>	<u>\$24,394</u>
<u>Costs and Expenses</u>		
Raw material used	14,306	16,658
Production and operating expenses	6,039	5,908
Inventory fluctuations	582	(2,315)
Selling expenses	1,621	1,585
General and administrative expenses	134	90
Depreciation and amortization	787	668
Taxes other than incomes taxes	563	476
Interest and expense on indebtedness	104	107
Total costs and expenses	<u>\$24,135</u>	<u>\$23,278</u>
<u>Income Before Income Taxes</u>	1,037	1,116
Provision for income taxes	397	457
<u>Net Income</u>	<u>\$ 640</u>	<u>\$ 659</u>

PHILLIPS PETROLEUM COMPANY
 H. P. SMITH PAPER COMPANY
 INCOME STATEMENT
 FOR THE YEARS ENDED DECEMBER 31, 1977 THROUGH 1982
 (000's Dollars)

	-----December 31,-----					
	<u>1977</u>	<u>1978</u>	<u>1979</u>	<u>1980</u>	<u>1981</u>	<u>1982</u>
Gross Income	\$ 33290	\$ 40460	\$ 47773	\$ 48924	\$ 55251	\$ 51419
Raw Material Used	19282	23246	26987	27983	31574	29850
Operating Expense	7012	8747	9985	8899	10461	10240
Selling Expense	2138	2366	2680	2993	3714	3507
General Expense	2451	2788	3190	3417	3291	3112
Depreciation Expense	<u>612</u> <u>31495</u>	<u>913</u> <u>38060</u>	<u>979</u> <u>43821</u>	<u>1051</u> <u>44343</u>	<u>1100</u> <u>50140</u>	<u>1255</u> <u>47964</u>
Income Before Income Taxes	1795	2400	3952	4581	5111	3455
Income Taxes	<u>330</u>	<u>1037</u>	<u>1693</u>	<u>2138</u>	<u>2158</u>	<u>1595</u>
Net Income	\$ <u>1465</u>	\$ <u>1363</u>	\$ <u>2259</u>	\$ <u>2443</u>	\$ <u>2953</u>	\$ <u>1860</u>

EXHIBIT B

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

1. Liabilities, if any, arising out of or from the litigation and claims reflected on Exhibit G of the Agreement
2. Potential liability for clean up at the Alburn, Illinois, waste disposal site.
3. Liability for federal, state and local taxes for 1982.

EXHIBIT C

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

Other conditions and possible claims, not elsewhere disclosed, within Section 5C of the Agreement.

1. Claims on U. S. Patent No. 3,518,158, held by Arhco, Inc. believed by Phillips to be most likely invalid.
2. Claims arising out of the manufacture and sale of the product described in Section 12D of the Agreement.
3. Claims arising from customer complaints identified below:

<u>Customer Name</u>	<u>H. P. Smith Complaint No.</u>
3M - St. Paul	30D*
W. R. Grace	81E
3M - St. Paul	77F
3M - Brookings	37G
Ameri Cal Corp.	69G*
Flexcon, Inc.	31H*
Rapid Processing	32H
Flexcon, Inc.	33H*
Allen Arthur	35H*
Lamart Corporation	41H
Soundcoat Company	50H
Essex Chemical	54H
Flexcon, Inc.	55H
Engineered Adhesives	61H*
Milliken & Company	67H*
Flexcon, Inc.	72H
Rexham Corporation	74H*
W. R. Meadows	78H
3M - Springfield	80H
Fasson	83H
Mactac Morgan	87H
Gila River Products	88H
W. R. Grace	89H
Rexham Corp.	90H*
Uniroyal, Inc.	91H

EXHIBIT C (Cont'd.)

<u>Customer Name</u>	<u>H. P. Smith Complaint No.</u>
Canada Decal	92H
3M - Brookings	93H*
Emhart Chemical	95H
Flexcon, Inc.	97H*
Flexcon, Inc.	100H
Air-O-Plastik	1I
Techniseal	2I
Flexcon, Inc.	3I*
Flexcon, Inc.	4I
W. R. Grace	5I
Andover Medical	7I
Kendall Company	8I
Engineered Coated Prod.	9I
3M - Nevada	10I
Flexcon, Inc.	11I*
Flexcon, Inc.	12I
Foam Seal	13I
Hallmark Cards	14I
Lamart Corp.	15I
B. F. Goodrich	16I
Flexcon, Inc.	17I
General Formulations	18I
Brunswick Corp.	19I
Meyer Cord.	20I
A.F.V. Manufacturing	21I
3M - Nevada	22I
3M - Nevada	23I

* These have been resolved at H. P. Smith as either invalid or with the customer due credit which is to be issued, which in the aggregate will not exceed \$30,000.00.

The complaints listed above, exclusive of those noted as resolved, have been reviewed by the sales, manufacturing and technical personnel at H. P. Smith and their best estimate of the maximum aggregate exposure of H. P. Smith on such complaints is \$450,000.00, and they do not expect exposure on any single complaint to exceed \$35,000.00.

EXHIBIT D

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

Title exceptions referred to in Section 5E of the Agreement.

I. Industrial Revenue Bond Agreements and documents referred to in Section 10 of the Agreement:

A. Bedford Park (Chicago) Plant:

1. Series 1976 Note dated December 1, 1976, in the principal amount of \$1,000,000, from H. P. Smith to the Village of Bedford Park, Illinois.
2. Loan Agreement dated December 1, 1976, between H. P. Smith and the Village of Bedford Park, Illinois.
3. Trust Indenture dated December 1, 1976, between the Village of Bedford Park and The First National Bank in Bartlesville, as Trustee, pursuant to which the Series 1976 Note and the Loan Agreement in items 1 and 2 above were assigned to the Trustee.
4. Memorandum of Agreement dated May 6, 1976, between the Village of Bedford Park and H. P. Smith.
5. Loan Guaranty Agreement dated December 1, 1976, from Phillips Petroleum Company to The First National Bank in Bartlesville, as Trustee.

B. Iowa City Plant:

1. Lease

- a. Lease dated May 1, 1969, from the City of Iowa City, Iowa, to Phillips Petroleum Company.
- b. Assignment of Lease dated October 13, 1969, from Phillips Petroleum Company to H. P. Smith Paper Co.
- c. First Supplemental Lease dated May 1, 1970, between the City of Iowa City and Phillips Petroleum Company and endorsed by H. P. Smith.

2. Mortgage and Indenture of Trust dated May 1, 1969, between the City of Iowa City and Third National Bank in Nashville, as Trustee.
3. First Supplemental Mortgage and Indenture of Trust dated May 1, 1970, between the City of Iowa City and Third National Bank in Nashville, as Trustee.
4. Instrument of Consent dated May 1, 1970, executed by Phillips Petroleum Company, and Ratification by Assignee dated May 1, 1970, executed by H. P. Smith, relating to the First Supplemental Mortgage and Indenture of Trust in item 3 above.
5. Construction Deposit Agreement dated May 1, 1969, between the City of Iowa City, Phillips Petroleum Company and Third National Bank in Nashville, as Depository (which Agreement has been fully completed).
6. Agreement dated February 28, 1969, between the City of Iowa City and Phillips Petroleum Company.
7. Joint Written Agreement dated May 1, 1970, between the City of Iowa City and Phillips Petroleum Company.
8. Agreement and Release of Easements dated May 1, 1970, between the City of Iowa City, Phillips Petroleum Company, H. P. Smith and Third National Bank in Nashville, as Trustee.

II. Terms, provisions, conditions, covenants, limitations, reservations and restrictions of the agreements and documents referred to in I.A and I.B of this Exhibit D and the following:

A. As to the Bedford Park (Chicago) Plant:

1. Deed dated April 11, 1963, to H. P. Smith from Clearing Industrial District, Inc. (two parcels).
2. Deed dated April 11, 1963, to H. P. Smith from Clearing Industrial District, Inc. (one parcel).
3. Deed dated January 3, 1963, to H. P. Smith from Alton Box Board Company.
4. Quit Claim Deed and Grant of Easement dated June 18, 1974, to H. P. Smith from The Belt Railway of Chicago.

5. Deed dated February 9, 1981, to H. P. Smith from Alton Box Board Company.
6. Deed dated January 15, 1981, to H. P. Smith from J. Bernard Jacobsen, et ux.
7. Agreement dated February 27, 1963, for rental by H. P. Smith of parking area, from the Village of Bedford Park.
8. Lease dated December 1, 1975, to H. P. Smith from The Belt Railway Company of Chicago, for sidewalk use.
9. Agreement dated April 11, 1963, for fire protection water connection by H. P. Smith with Clearing Industrial District, Inc.
10. Right of Way Easement dated June 21, 1973, to H. P. Smith from the Village of Bedford Park for water main construction.
11. Right of Way Easement dated November 26, 1976, from Walnut Management Corporation to Commonwealth Edison Company.
12. Agreement of Sublease dated April 15, 1976, from H. P. Smith to Alton Box Board Company.

B. As to the Iowa City Plant:

1. Deed dated June 18, 1969, to the City of Iowa City from Phillips Petroleum Company.
2. Deed dated June 23, 1970, to the City of Iowa City from Phillips Petroleum Company.
3. Conveyance, Assignment and Bill of Sale dated May 1, 1970, to the City of Iowa City from Phillips Petroleum Company.
4. Drainage Easement dated September 22, 1970, to Phillips Petroleum Company from Business Development, Incorporated.
5. Agreement to Exchange Drainage Easement dated July 14, 1975, between R. M. Boggs, et al. and Phillips Petroleum Company relating to the Drainage Easement in item 5 above.

III. Exceptions to title appearing in the following:

A. As to the Bedford Park (Chicago) Plant:

1. Chicago Title and Trust Company Owner's Policy No. 53-04-848 dated April 11, 1963, issued in the name of H. P. Smith Paper Co., as insured.
2. Chicago Title and Trust Company Owner's Policy No. 52-73-196 dated April 15, 1963, issued in the name of H. P. Smith Paper Co., as insured.
3. Title Opinion dated March 25, 1975, by Lashly, Caruthers, Thies, Rava & Hamel.
4. Lawyers Title Insurance Corporation Owner's Policy No. 582115 dated March 15, 1981, issued in the name of H. P. Smith Paper Co., as insured.
5. Chicago Title Insurance Company Owner's Policy No. 68-05-005 dated January 23, 1981, issued in the name of H. P. Smith Paper Co., as insured.

B. As to the Iowa City Plant:

Final Abstract Opinion dated May 13, 1969, by Jay H. Honohan

- IV. Easements, encroachments, overlaps, conflicts in boundaries or other matters, if any, that would be reflected by an accurate survey and inspection.
- V. Terms and conditions of the leases and rental arrangements with respect to personal property referred to on Exhibit E of the Agreement.
- VI. Statutory and/or common law landlord liens, if any, under the laws of the States of Iowa and Illinois, and the right to statutory and/or common law liens under the laws of the States of Iowa and Illinois for labor, material and/or services arising out of uncompleted work or projects; provided, however, no such lien or right to lien, is with respect to past due or delinquent accounts or indebtedness and no action is pending to foreclose on any such lien or right to lien.

EXHIBIT E

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

Contracts, commitments and leases referred to in Section 5G of the Agreement:

1. Those disclosed on Exhibits D, F, I and K of the Agreement or elsewhere in the Agreement.
2. Bank arrangements for accounts, lock boxes and safe deposit boxes identified to Buyer under Section 5H of the Agreement.
3. Home Indemnity Company of Manchester, New Hampshire, insurance Policy No. GL-1280810, liability relating to lease from the Village of Bedford Park on parking area.
4. Workers compensation coverage under The Ohio State Insurance Fund Scheme.
5. Letter of indemnity dated April 5, 1983, by H. P. Smith to John J. Mietlicki relating to Duncan vs. H. P. Smith et al reflected on Exhibit G of the Agreement.
6. Confidentiality agreements with customers:
 - a. Minnesota Mining and Manufacturing Company dated October 27, 1980.
 - b. W. H. Brady Co. dated November 20, 1981.
 - c. Rexham Corporation dated June 24, 1982.
7. Confidentiality agreement with Dow Corning Corporation (as potential supplier) dated October 22, 1982.
8. Licenses and assignments, provision for which is made in Section 5K of the Agreement, and assignments of agreements as to confidential information provided for in Section 5G of the Agreement.*

* These will not be terminated on the Closing Date.

9. Equipment etc. ... rentals with:

- a. Container Rental - Drea Rolloff containers - Iowa City Plant.
- b. City of Iowa City - 2 fire hydrants.
- c. Pitney Bowes - postage meter and mailing equipment - Chicago Office.
- d. Pitney Bowes - postage meter - Iowa City Plant.
- e. P B Leasing - mailing equipment - Iowa City Plant.
- f. Minnesota Mining and Manufacturing Company - 42 Static Eliminators - both plants.
- g. Western Union - telex equipment.

10. Personal property leases:

- a. Equipment Lease Agreement (a sublease), dated July 23, 1982, as amended by Amendment dated September 30, 1983, Phillips Petroleum Company, lessor, computer equipment - Chicago Office.**
 - b. Dated July 21, 1980, Xerox Corporation, lessor, 3450 copier - Chicago Office.
 - c. Dated July 9, 1982, Xerox Corporation, lessor, 3100 copier - Iowa City Plant.
 - d. Dated August 10, 1981, International Business Machines Corp., lessor, printer, data and display stations and software - Chicago Office.
 - e. Dated July 6, 1983, Xerox Corporation, lessor, 400-I telecopier, Iowa City Plant.
11. London Guarantee & Accident Company Policy Nos. N-10171 (July 1, 1979 to June 30, 1980) and N-12114 (July 1, 1981 to June 30, 1982) not now in force but under which accounts listed on Attachment I to this Exhibit E, which is made a part hereof by reference, have been filed for collection.
12. Sales Contract dated January 1, 1983, as amended by Amendment No. 1 dated September 16, 1983, with Phillips Chemical Company, as seller, supply of extrusion coating grade LDPE.**
13. License from Network Associates, Inc. dated November 9, 1979, for private label packaging of products and commitment to Network Services Company relating to food wrap products dated July 13, 1978 and October 2, 1978.

** This agreement will not be terminated on the Closing Date.

14. Elsner Engineering Works, Inc. dated October 26, 1972, covering the use of information on design and construction of the "H. P. Smith" removable plastic core.
15. Dow Corning Corp. dated May, 1977, as amended by letter dated January 21, 1981, covering the purchase of Silicone.
16. International Paper Co. dated January 1, 1983, covering supply of Reelcote paper.
17. Northern Illinois Gas Company dated June 2, 1976, covering the purchase of gas.
18. Commonwealth Edison Company dated March 13, 1973, covering the purchase of electricity.
19. Cohan & Paul Inc. dated October 1, 1980, covering advertising services.
20. Iowa-Illinois Gas and Electric Co. dated November 20, 1969, covering the purchase of electricity and transformer rental.
21. Western Weighing and Inspection Bureau dated September 6, 1979, covering the acceptance of weights and descriptions on bills of lading.
22. Chicago, Rock Island and Pacific Railroad Co. dated January 1, 1971, as followed by an additional agreement dated July 1, 1977, covering rail service.
23. Telephone Analysis Co. dated August 18, 1978, for surveying communication systems and telephone directory advertising.
24. Illinois Bell Telephone Co. dated August 31, 1982, covering furnishing, installing and maintaining software for telephone system.
25. Settlement Agreement dated August 15, 1983, with Scharr Industries, Inc.
26. Koppers, The Aetna Casualty and Surety Company dated April 26, 1977, roof bond.
27. Knickerbocker Roofing & Paving Co. Inc. dated May 30, 1981, roof guarantee.
28. T. G. Dax & Associates dated April 8, 1982, for services in regard to Cook County, Illinois, tax assessments.
29. Settlement Agreement dated October 13, 1981, with Daubert Industries, Inc. et al.

30. The following relating to the expansion project at the Iowa City Plant:
- a. Contract No. ICM 22150 with Fandell, Inc., Work Orders thereunder and Purchase Order dated November 12, 1982, with United Fire & Casualty Company Performance Bond and Labor and Material Payment Bond.
 - b. Contract No. ICE 25171 dated September 13, 1983, with O. F. Paulson, Work Orders thereunder and Purchase Order dated August 23, 1983, with Merchants Bonding Company, Performance Bond and Labor and Material Payment Bond both dated September 13, 1983.
 - c. Contract No. ICM 22265 dated November 19, 1982, with Viking Fire Protection Company, Work Orders thereunder and Purchase Order dated November 19, 1982.
 - d. Contract No. ICM 22245 with West Side Erectors, Inc., Work Orders thereunder and Purchase Order dated November 19, 1982.
31. H. P. Smith Purchase Order No. E19730 to Worldwide Conveyor Machine Co. for lab coating line.
32. H. P. Smith Purchase Order No. E24391 to Planned Interiors, Inc. for office partitions.
33. Contract No. ICE 25428 dated October 12, 1983, with Townsend Roofing and Sheet Metal Co., Inc. and Purchase Order of the same date and number for roof rebuilding at the Iowa City Plant.
34. H. P. Smith Purchase Order No. P-25305, dated September 13, 1983, to Crown Zellerbach for Oiling Stock.
35. H. P. Smith Purchase Order No. P-25391, dated October 5, 1983, to Union Camp for paper stock.
36. H. P. Smith Purchase Order No. P-25472, dated October 10, 1983, to International Paper Co. - Louisiana Mill for paper stock.
37. H. P. Smith Purchase Order No. P-25474 dated October 10, 1983, to International Paper Co. - Louisiana Mill for paper stock.
38. Distributorship Agreements:
- a. Cupples Paper Bag company dated July 1, 1982, covering the sale of food wrap products.

- b. Scott Graphics International, a division of Scott Continental S.A. dated February 1, 1983, covering the sale of release products.
- c. Affiliated Paper Companies dated August 10, 1983, covering the sale of food wrap and industrial products.

39. Sales Representative Agreements and Arrangements.

a. Agreements:

- (1) Dyal Sales Co., Inc. dated June 14, 1982, covering the sale of food wrap products.
- (2) Rudd and Worfford, Inc. dated June 21, 1982, covering the sale of food wrap products.
- (3) Scott Graphics International dated September 13, 1983, for sales to 3M Co. in Europe.

b. Arrangements:

- (1) Pacon Corporation - Natick, Massachusetts
- (2) Walter Taillie Assoc., Inc. - Rochester, New York

40. Broker Agreements and Arrangements for Food Wrap Products:

a. Agreements:

- (1) D. G. Baker & Co. dated February, 1975.
- (2) Michael Albert Brokerage Co. dated June, 1968.
- (3) Campbell-Hulihan Co. dated January 24, 1980.
- (4) Buttry-Taylor, Inc. dated December, 1976.
- (5) Blackwell-Stevenson Company dated August, 1955.
- (6) Hammack & Associates dated March, 1969.
- (7) Southeastern Brokerage Co., Inc. dated October, 1977.
- (8) Cadena-Jacson, Inc. dated October, 1977.
- (9) James O. Brown Co. dated July, 1957.
- (10) Groesbeck & Mancini dated September, 1969.
- (11) Paul Inman Associates dated November, 1975.
- (12) Arrow Sales & Marketing dated October, 1978.
- (13) Humphrey-Clover Co. dated December, 1966.
- (14) Read-Mallon-Clanton Sales dated September, 1978.
- (15) Roberts & Associates dated October, 1979.
- (16) Demmerle, Bosse & Grey dated July, 1977.
- (17) Wyman Platt & Associates dated September, 1978.
- (18) Kurtzman, Bentley & Fahrenbruch dated October, 1963.
- (19) Ferguson Brokerage Co. dated June, 1959.
- (20) Diaz/Robertson Brokerage Co. dated August, 1978.
- (21) Arkansas Brokerage Co. dated October, 1977.
- (22) George Oliva Co. dated January, 1980.
- (23) Marvin Garrett Co. dated April, 1977.
- (24) Quesenberry & Catlin dated October, 1979.

- (25) Coffaro & Matakis Co., Inc. dated October, 1956.
- (26) Le Gros-Waddell Co. dated February, 1962.
- (27) R. E. McDaniel Co. dated June, 1958.
- (28) Hull Sales Co., Inc. dated June, 1960.

b. Arrangements:

- (1) Commonwealth Brokerage Co.
- (2) G. Nelson Sales Co.
- (3) Wiginton-Metropolitan, Inc.
- (4) Tri-Finer Brokerage, Inc.
- (5) R. H. Wallish Associates
- (6) G. Krautblatt Co.
- (7) Sell Associates
- (8) Craig Brokerage Co.
- (9) Brown-Stagner Brokerage Co., Inc.
- (10) United Sales Co.
- (11) Performance Systems-Montana Division
- (12) Wood & Bramblett, Inc.
- (13) Hutchison-Donawho-West Co.
- (14) Upstate Food Brokers
- (15) Harwood-Goldford & Baker
- (16) McDermott Food Brokers, Inc.
- (17) Damon Sales Co., Inc.
- (18) Albany Brokerage Co.
- (19) Earl Tonkin, Inc.
- (20) United Food Brokers
- (21) Beadles & Wright, Inc.
- (22) Znerold Brokerage, Inc.
- (23) Backer-Le Jeune, Inc.
- (24) Kelley-Clarke Co.
- (25) Bell & Schroetenboer

41. Warehouse Agreements and Arrangements:

- a. American Storage Co.
- b. Central Cumberland Corp.
- c. Central Detroit Warehouse Co. dated June 1, 1982.
- d. Cupples Paper Bag Co. dated July 1, 1982.
- e. Gilbertville Storage, Inc.
- f. Gratton Warehouse Company dated March 1, 1982.
- g. Marshall Warehouse Company
- h. Metropolitan Distribution Centers, Inc. dated March 5, 1982.
- i. Murphy Warehouse Company dated April 1, 1982.
- j. Murphy Bonded Warehouse, Inc.
- k. Peninsular Warehouse Co., Inc. dated September 1, 1982.
- l. Piepho Moving & Storage dated February 1, 1982.

Attachment I

Attachment I to Exhibit E of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

<u>Customer</u>	<u>Date of Write off</u>	<u>Balance 9-30-83</u>
Hudson Wholesale	Prior to 1980	2,619.41
Lehigh Wholesale	"	697.92
Press Labs	"	5,223.44
Riverside Wholesale	"	533.45
Special Products Inc.	"	4,418.29
United Printer/Converters	"	3,650.90
Webtek Corp.	"	3,503.26
Studio One	9-79	6,181.15
Med General, Inc.	1980	8,296.16
Capozello Paper	1981	1,890.16
Circle Packaging	3-81	702.96
Syntac	"	54,296.20
Mac's General Store	"	500.00
Fricke & Peters	5-81	2,991.12

EXHIBIT F

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

- A. Contracts and commitments referred to in Section 5H of the Agreement.
 - 1. Agreements respecting confidential information of H. P. Smith, referred to in Section 5G of the Agreement.
 - 2. Collective bargaining agreements reflected on Exhibit I.
 - 3. Employee benefit plans set forth on Exhibit K.
- B. Powers of Attorney to act on behalf of H. P. Smith referred to in Section 5H of the Agreement:
 - 1. Dated September 28, 1983, to Colleen Hutchison and Peter J. Marks to act with respect to Application for Determination: H. P. Smith Paper Co. Salaried Retirement Plan and any administrative appeals.
 - 2. Dated September 28, 1983, to Colleen Hutchison and Peter J. Marks to act with respect to Applications for Determination: H. P. Smith Paper Co. Hourly Retirement Plan and any administrative appeals.
 - 3. Dated September 28, 1983, to Colleen Hutchison and Peter J. Marks to act with respect to Applications for Determination: Employee Savings and Investment Plan and Trust Agreement of H. P. Smith Paper Co. and any administrative appeals.
 - 4. Letter Agreement dated April 8, 1982, with Theodore G. Dax & Associates relating to state and local property taxes in Cook County, Illinois.
 - 5. Power of Attorney for prosecuting U.S. Patent Application Serial No. 529,004, to L. N. French, J. H. Hughes, H. D. Doescher, Jack E. Phillips, James W. Williams, B. H. Geissler, John D. Olivier and Bion E. Hitchcock.

EXHIBIT G

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

Pending Litigation and Proceedings referred to in Section 5I of the Agreement:

A. Other than Workers Compensation

1. Counterclaim asserted in H. P. Smith Paper Co. vs. Studio One, Inc., No. 80 ML-101936, Circuit Court, Cook County, Illinois, First Municipal District.
2. Barbara Duncan vs. H. P. Smith Paper Co., John J. Mietlicki and Leonard Lister, No. 83 L 3691, Circuit Court, Cook County, Illinois, County Department, Law Division.
3. Russell Wende vs. H. P. Smith Paper Co., No. 81 L 29003, Circuit Court, Cook County, Illinois, County Department, Law Division.

B. Workers Compensation

1. Duncan, Barbara (Secretary), auto injury, not company car, not on job.
2. Young, Roger R. (Slitter Operator), ankle fracture.
3. Fernandez, Richard (Operator), bruised arm and hand.
4. Hollis, Jerry Dale (Operator), hot glue on arm and hand.
5. Bryant, Fount (Maintenance), elbow and chin burn.
6. Bryant, Fount (Maintenance), broken finger.
7. Brown, Edward W. (Slitter Operator), pulled muscle.

EXHIBIT H-1

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

GROUP 1

<u>Phillips Reference</u>	<u>U.S. Patent</u>	<u>Issue Date</u>	<u>Inventor</u>
13825	3,318,721	May 9, 1967	G. E. Lineburg
13930	3,341,388	September 12, 1967	E. D. Bunyea
16254	3,412,918	November 26, 1968	C. C. Sherman
15895	3,432,333	March 11, 1969	A. R. Hurst
16094	3,494,783	February 10, 1970	T. J. Kimura and A. R. Hurst
19752	3,690,909	September 12, 1972	J. G. Finley
21466	3,749,593	July 31, 1973	L. H. Keiser
20490	3,752,732	August 14, 1973	L. A. Peterson and J. G. Finley
22537	3,860,383	January 14, 1975	Paul Sirevicius
22914	3,862,869	January 28, 1975	L. A. Peterson and J. G. Finley
22263	3,936,582	February 3, 1976	L. H. Keiser
21719	3,783,089*	January 1, 1974	A. R. Hurst and S. S. Mirasol
31415	ASN 529,004	filed 9/2/1983	L. H. Keiser and H. M. Challenger

* U. S. 3,783,089 has been assigned jointly to H. P. Smith and Sealright Co., Inc. as S. S. Mirasol was a Sealright Co., Inc. employee at the time of the conception of the invention.

GROUP 2

<u>Phillips Reference</u>	<u>Patent No.</u>	<u>Issue Date</u>	<u>Inventor</u>
17545	US3,503,782	March 31, 1970	E. C. Ayres
17789	US3,567,571	March 2, 1971	R. J. Martinovich
18978	US3,577,885	May 14, 1971	Johnny L. Wells
25710	US4,151,344	April 24, 1979	R. C. Doss and R. E. Reusser
26148	US4,261,876	April 14, 1981	R. E. Reusser
26149	US4,288,496	September 8, 1981	R. E. Reusser and B. E. Jones
26396*	CA1,113,197	November 24, 1981	R. C. Doss and R. E. Reusser

*CA 1,113,197 corresponds to US 4,151,344

GROUP 3

<u>Phillips Reference</u>	<u>U.S. Patent</u>	<u>Issue Date</u>	<u>Inventor</u>
17613	3,536,797	October 27, 1970	R. G. Cowan and D. F. Stewart
18634	3,893,957	July 8, 1975	D. E. Mixon and D. F. Stewart

EXHIBIT H-2

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

SMITH MARKS AND SMITH COPYRIGHTS

SMITH COPYRIGHTS:

NONE

SMITH MARKS:

MARK

Aspen
HPS
Sta-Tuf
Loxol
20 Below
20 Below & Design
Poly Slik
PolyCEL
Super 20 Below
Fixol
Super Un-Lox
Un-Lox
Cor-o-bate

EXHIBIT I

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

Collective bargaining Agreement dated February 3, 1983, between H. P. Smith and International Brotherhood of Teamsters Local No. 714.

EXHIBIT J

Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

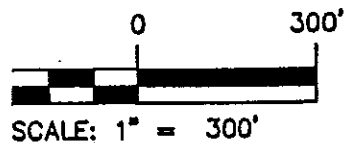
Insurance deductible amounts referred to in Section 8A of the Agreement:

<u>Period</u>	<u>Deductible Amount</u>
December 21, 1962 to July 1, 1970	\$ 100,000
July 1, 1970 to January 1, 1980	\$ 250,000
January 1, 1980 through the Effective Time	\$1,000,000

EXHIBIT K

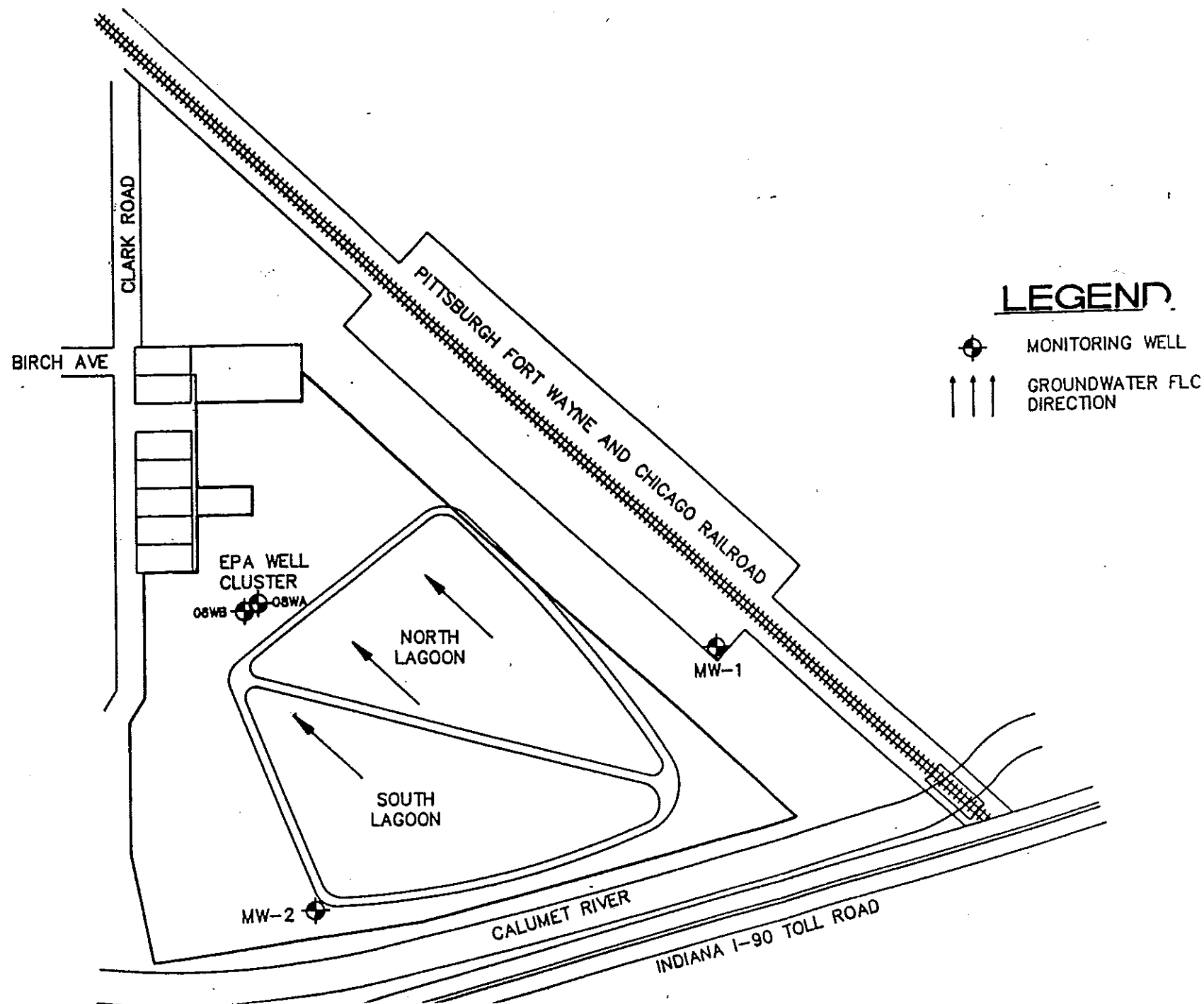
Attached to and made a part of Stock Purchase Agreement ("Agreement") dated October 12, 1983, between Phillips Petroleum Company and Phillips Petroleum Foundation, Inc., as Sellers, and James River Corporation of Virginia, as Buyer.

- A. Each plan as defined in Section 3(3) of ERISA as referred to in Section 9 of the Agreement:
 - 1. H. P. Smith Paper Co. Salaried Retirement Plan
 - 2. H. P. Smith Paper Co. Hourly Retirement Plan
 - 3. Employee Savings and Investment Plan and Trust Agreement of H. P. Smith Paper Co.
 - 4. H. P. Smith Paper Co. Group Insurance Plan, inclusive of the following health maintenance plans available as alternate benefits under the Medical Plan:
 - a. Michael Reese Health Plan
 - b. HMO of Illinois (a/k/a Health Assurance Plan)
 - 5. H. P. Smith Paper Co. Long-Term Disability Insurance Plan
 - 6. H. P. Smith Paper Co. Voluntary Group Accident Insurance
 - 7. H. P. Smith Sales Person Compensation Program.
- B. Other employee benefit programs:
 - 1. H. P. Smith Paper Co. Unavoidable Absence Benefit Plan
 - 2. H. P. Smith Paper Co. Vacation Pay Plan
 - 3. H. P. Smith Paper Co. Employee Moving Policy
 - 4. H. P. Smith Paper Co. Educational Assistance Plan
 - 5. H. P. Smith Paper Co. Scholarship Program
 - 6. Benefits provided for under the H. P. Smith Paper Co. Standard Operating Policy
 - 7. H. P. Smith Paper Co. Employee Suggestion Plan
 - 8. H. P. Smith Paper Co. medical examination program
 - 9. H. P. Smith Paper Co. service award program
- C. The contracts and commitments relating to and evidencing the foregoing plans and programs.



TOP OF CASING ELEVATION USGS DATUM (FT)	STATIC WATER ELEVATION (10-14-88) USGS DATUM (FT)
591.75	583.53
597.71	582.32
593.77	580.28
593.83	580.20

Attachment II



GARY DEVELOPMENT COMPANY, INC. LANDFILL
479 North Cline Avenue
P.O. Box 6056
Gary, Indiana 46406
EPA I.D. No. IND 077 005 916
Solid Waste Construction Permit No. SW-133
Solid Waste Operating Permit No. 45-2

initiated by
Matthew T. Klein
Hazardous Waste Section
Office of Enforcement
Indiana Department of Environmental Management
October 14, 1996

Enforcement Sensitive
Attorney-Client Work Product
Not For Public View

January 1970

National Disposal Contractors of Barrington, Illinois, proposed a landfill at the current Gary Development Company, Inc. ("GDC") site. The proposal was denied because (1) insufficient impermeable soil cover; (2) subsurface material was sand; (3) the water table was two (2) feet below the surface of the site; and (4) the site was in the floodplain of the Grand Calumet River. The site was formerly a borrow pit for the construction of Interstate 90.

January 13, 1970

The proposed solid waste landfill site was evaluated by representatives of the National Disposal Contractors and representatives of the Indiana State Board of Health ("ISBH").

January 22, 1970

A letter to Mr. George Edema, Vice President, National Disposal Contractors, was issued from Mr. Ray Kocher, Chief, General Sanitation Section, Division of Sanitary Engineering, ISBH stating that the "site is not satisfactory for a sanitary landfill operation." Specifically, sufficient cover material, necessary and of a quality for proper operation of a sanitary landfill, was not available at the site; and the identification of fine sand from zero (0) to thirty (30) feet did not provide protection from leachate contamination.

October 19, 1970

The Common Council of the City of Gary on October 6, 1970 passed Ordinance No. 4489 entitled, "An Ordinance Allowing 'Special Use' in M-3 District of Chapter 8, Entitled 'Manufacturing Districts' of Title 6 Entitled 'Zoning Ordinance' of the Municipal Code of the City of Gary, Indiana." Section 2 of Ordinance No. 4489 states, "As special conditions of the aforesaid Special Use and as an additional restriction on said use, the following requirements shall hereafter and at all time be met by the owner, lessee or any other person, firm or corporation using such real estate:

1. That the petitioner submit to this commission site plans and their program for operations before the erection of the plant and commencement of operations.
2. That the hole be drained of water and that it will be continually pumped until the completion of the landfill or termination of the Special Use by the City of Gary.
3. That the Sanitary District approve the outflow of water to prevent pollution.
4. That there will be no open burning and any burning or smoke emission be in conformance with the Gary Air Pollution Ordinance.

5. That if this petition is approved, the petitioner will post a \$100,000 bond for the life of the dump. This bond will guarantee landfill, the fencing of the dump and any liability that may result from the operation of the dump.
6. That all garbage, trash and refuse dumped, will be compressed.
7. That the compressed garbage will be covered daily with sand or dirt to seal it.
8. That no additional sandmining or earth removal be carried out except site preparation for construction of the plant and for use as cover material over the compressed garbage.
9. That failure to comply with the above listed conditions is adequate grounds for the Director of the Department of Development and Planning with concurrence of the Corporation Counsel to revoke this Special Use."

Ordinance No. 4489 was signed by Mayor Richard Hatcher on October 19, 1970.

August 25, 1972

Messrs. Robert Babcock, Robert Heider, and Robert Cotton, ISBH, met with Mr. Jackie Shropshire, attorney representing the Rock Road Construction Company (5915 North Rogers Avenue, Chicago, Illinois), the owner of the site. Mr. Shropshire noted that his client was interested in seeking approval to use the sixty-one (61) acre borrow pit for use as a solid waste landfill. He stated that the borrow pit is approximately twelve (12) years old and has a depth of roughly twenty-five (25) feet. Mr. Shropshire provided a copy of Gary City Ordinance No. 4489, signed by Gary Mayor Richard Hatcher on October 19, 1970, evidently approving the use of the borrow pit, with stipulations, as a solid waste landfill. Mr. Shropshire was currently waiting for the ISBH to approve the pumping of the water within the borrow pit into the Grand Calumet River.

October 3, 1972

Mr. Joseph Tite, P.E., City Engineer for Michigan City, telephoned Mr. Babcock to notify that he was considering acting as the consulting engineer for the owner of the site. Mr. Tite noted that the borrow pit would have to be drained prior to construction of the solid waste landfill. He inquired as to what analyses would need to be performed to demonstrate that the borrow pit water would not violate Stream Pollution Control ("SPC") Regulation 7R when pumping such water into the Grand Calumet River. Mr. Babcock suggested BOD, total phosphate and ammonia nitrogen would be needed, and possibly various metals, in making such a determination.

October 1972

Mr. Joseph Tite, P.E., contacted the ISBH to notify it that he had been hired by the Road Rock Construction Company from Illinois to design a solid waste landfill at the GDC site. Mr. Tite requested permission from the Stream Pollution Control Board ("SPCB") to discharge water from the flooded borrow pit into the Grand Calumet River. After an analysis of the water within the borrow pit, the SPCB granted the now Gary Land Development Company, or GDC, permission to pump this water from the borrow pit into the Grand Calumet River on May 16, 1973.

May 7, 1973

Mr. Tite issued a letter to Mr. Roland P. Dove, Chief, General Sanitation Section, Division of Sanitary Engineering, ISBH, requesting permission to begin pumping water from the borrow pit into the Grand Calumet River. It was estimated that the process would take approximately thirty (30) to forty (40) days. Mr. Tite proposed that the point of discharge occur on the north bank of the Grand Calumet River approximately 0.4 miles east of Cline Avenue. The letter noted that once the water is removed from the borrow pit, GDC would begin construction of the external separate perimeter drainage system, internal bottom grading of the site, and separate leachate collection trenching.

May 16, 1973

A letter was issued to Mr. William Nanini, GDC, from Mr. Oral Hert, Technical Secretary, ISBH, stating the SPCB had approved Mr. Tite's proposal to pump water from the borrow pit into the Grand Calumet River on May 15, 1973. The approval was granted with the following conditions:

1. A complete proposal for the sanitary landfill operation be submitted to and approved by the ISBH prior to any operations in the dewatered pit;
2. That, if nuisance or pollution conditions are created, immediate corrective action will be taken by the operator;
3. That all necessary local permits, including zoning, be obtained prior to any operation; and
4. That this approval be renewed upon any change in ownership or operating contractor.

This approval was noted as Approval No. SW-129.

May 31, 1973

GDC submitted a solid waste landfill proposal as prepared by Mr. Tite. The proposal included: (1) an exterior perimeter drainage system; (2) clay walls to seal the walls of the borrow pit; (3) an interior leachate collection system to be connected to the East Chicago Sanitary District sewer system; (4) daily clay cover; (5) no disposal of liquid or sludge wastes; and (6) a system of groundwater monitoring wells was to be installed around the perimeter of the site.

June 21, 1973

The proposal for the construction of the GDC solid waste landfill was approved (Solid Waste Construction Permit No. SW-133) by the SPCB. [*Finding of Fact No. 3 in Cause No. N-146 notes this date to be June 19, 1973.*]

August 20, 1973

A letter was issued to Mr. Nanini from Mr. Victor Wenning, P.E., Assistant Chief, Division of Water, Indiana Department of Natural Resources ("IDNR"), advising Mr. Nanini that pursuant to Chapter 318, 1945 Flood Control Act, as amended, (IC 1971-13-2-22), any construction in a floodway must also be approved by the Natural Resources Commission before construction is commenced. The letter indicated that the project to pump water from the borrow pit into the Grand Calumet River would require such approval.

October 5, 1973

An inspection of the GDC Landfill was conducted at 11:30am by Messrs. R. Colton and David Finton. They observed water still leaching into the gravel pit.

January 4, 1974

An inspection of the GDC Landfill was conducted at 2:00pm by Mr. Claude Goodley. Mr. Goodley noted that the pit was not completely drained of the water that had been leaching into it.

January 23, 1974

A letter was issued to Mr. Tite from Mr. Brian Opel, Acting Chief, Solid Waste Management Section, regarding an update on the status of the GDC site.

February 1974

The GDC site had not been dewatered and no appreciable amount of construction of the solid waste landfill had occurred.

March 8, 1974

Mr. Tite informed ISBH that he was no longer involved in the development of the GDC Landfill, prompting a written request on March 8, 1974 to GDC for assurances that the GDC Landfill would be constructed in accordance with SW-133.

April 23, 1974

A letter to Mr. Opel from Mr. Charles Dickens, Zoning Administrator, Department of Development and Planning, City of Gary, noted that the Department of Development and Planning was evaluating whether GDC had met the conditions placed upon them. *[Most likely, these are the conditions enumerated within Ordinance No. 4489 from October 19, 1970.]*

August 28, 1974

Correspondence from Mr. Nicholas Cost, Acting Director, Gary Sanitary District, to the SPCB noted that the leachate collected from the GDC Landfill would be transported via GDC's four thousand (4,000) gallon tanker to their wastewater treatment plant. GDC shall pay the Gary Sanitary District \$12.00 per load. *[Did SW-133 only authorize the transport of leachate to the East Chicago Sanitary District, not to the Gary Sanitary District?]*

August 29, 1974

Messrs. Goodley and Finton conducted the final pre-permit inspection of the GDC Landfill.

September 11, 1974

A letter was issued to Mr. Larry Hagen from Mr. Hert granting final approval to GDC, thus allowing operations to begin. The GDC Landfill was inspected by Messrs. Goodley and Finton on August 29, 1974 and it was determined that the construction requirements of SW-133 were met and, therefore, the site should be issued its operating permit. Subsequent inspections revealed the two (2) separate collection systems, one for dewatering and one for leachate collection, were never constructed. Furthermore, the leachate was being pumped into the Grand Calumet River rather than being transported to the Gary Sanitary District wastewater treatment plant. Lastly, the inspections noted that the sides of the sand pit were not adequately lined with clay and the daily cover, when applied, is sand and not clay as required.

September 13, 1974

The GDC Landfill began its landfill disposal operation.

November 14, 1974

The SPCB received GDC's *Application for Sanitary Landfill Operating Permit* as completed by Mr. Hagen. Nine (9) pieces of information were requested. Mr. Hagen answered all the questions, noting, among other things:

- the GDC Landfill is sixty-one and nine-tenths (61.9) acres located in the Southwest $\frac{1}{4}$, Section 35, Township 37 [North], Range 9 West. It is also located six hundred and fifty (650) feet east of Cline Avenue and north of the [Grand Calumet] River.
- operations at the GDC Landfill began on September 13, 1974.
- the application noted that the GDC Landfill was currently accepting eight hundred (800) [cubic] yards of garbage and five hundred (500) yards of concrete and brick per day.
- the application listed Independent Waste Company (with the temporary permission of Mr. Finton) as disposing of twelve thousand (12,000) gallons of Dripolene sludge per week [*see the February 24, 1975 entry on Dripolene sludge.*]

December 17, 1974

Messrs. Goodley and George Dayhuff inspected the GDC Landfill at 11:00am and did not find any problems at that time.

January 30, 1975

The GDC Landfill was inspected by Mr. Goodley at 2:00pm. Liquid wastes were observed being disposed. [*The report from which this information is derived notes that GDC accepted hazardous wastes, liquid wastes, and sludge wastes from January 30, 1975 until, at least, January 18, 1977, the date of Mr. Bruce Palin's report.*] Mr. Hagen, the site manager at the time, was reminded that he was not allowed to accept these wastes without approval of the SPCB.

February 11, 1975

The GDC Landfill was inspected.

February 13, 1975

A letter from State Representative Donnabelle Mahoney to Mr. Hert inquired as to the nature of the GDC Landfill.

February 20, 1975

The GDC Landfill was issued Solid Waste Operating Permit No. 45-2. [*Verify this date.*]

February 24, 1975

A response by Mr. Samuel Moore, Acting Technical Secretary, ISBH, to State Representative Mahoney noted, among other things, that operations at the GDC Landfill began in September, 1974 and that the SPC-18 operating permit would be issued within the next few days.

A letter was issued to Mr. Tom Crumpton, Independent Waste Systems, Inc., P.O. Box 8206, Merrillville, Indiana, 46410, from Mr. Dove regarding the approval for disposal of Union Carbide's Dripolene at the GDC Landfill. The letter approved four (4) to five (5) truckloads per week for a period of six (6) months. Such disposal at the GDC Landfill was conditioned on the Dripolene being mixed with the regular municipal solid waste and being covered daily.

April 1, 1975

The GDC Landfill was inspected by Mr. Goodley at 3:30pm. Mr. Goodley noted that GDC was disposing of solid waste into water and, additionally, a noticeable amount of paper was blowing around the GDC Landfill.

June 4, 1975

The GDC Landfill was inspected by Mr. Goodley at 1:30pm. Mr. Goodley noted that paper was blowing around at the GDC Landfill.

June 18, 1975

A letter was issued to Mr. Art Davis, Conservation Chemical Company, Box 6066, Gary, Indiana, 46406, from Mr. Dove regarding the approval for disposal of neutralized sludges from Conservation Chemical Company at the GDC Landfill. The approval letter was an interim approval letter until a more environmentally acceptable disposal method was identified. Other conditions included:

1. the sludge should be mixed with sand for dewatering and disposed in a trench located at least one hundred (100) feet from the general refuse. No other materials or refuse may be mixed with the sludge;
2. a minimum of one (1) foot of clay cover soil be applied immediately. Further, a final cover of two (2) feet of clay be applied upon completion of the area;
3. the disposal area for the sludge be noted on a plot plan to prevent disposal of other materials in this area;

4. prior arrangement shall be made with Mr. Hagen to assure that the sludge is not deposited during inclement weather; and
5. should the disposal of the sludge create an environmental problem, corrective measures will be initiated.

October 9, 1975

The GDC Landfill was inspected by Mr. Opel at 11:15am. Mr. Opel noted that the daily cover being applied to the GDC Landfill was inadequate, noting on the inspection report that good compaction of refuse exists, but daily cover is insufficient. Specifically, an area of nearly 2 acres of insufficiently compacted refuse existed. The report also noted that the East Chicago Incinerator was "hauling in" as the incinerator was out of service. Mr. Opel also observed that a pit, containing oily, tar-type wastes, was in use near the refuse on the working face, and a pit on the western portion of the "built up" area contained drums, solid wastes, and liquid wastes from Arco in East Chicago.

October 10, 1975

A letter was issued to Mr. Hagen from Mr. Opel noting that the GDC Landfill was one of the few landfills in Indiana with special approval to accept hazardous waste for disposal. More importantly, the letter stated that the ISBH would soon require the monitoring of the groundwater surrounding the GDC Landfill.

October 27, 1975

Mr. Mike Finton inspected the liquid waste disposal area at the GDC Landfill. Mr. Finton explained to Mr. Hagen that GDC would need to secure the appropriate permits for the acceptance of any liquid waste for disposal at the GDC Landfill. Furthermore, the indefinite ponding of liquid wastes was not in keeping with the ISBH requirements for liquid waste disposal. Mr. Finton stated that the liquid wastes should be mixed with incoming refuse. Mr. Finton also noted that Mr. Hagen should prepare to install a groundwater monitoring system as this was in accordance with the original proposal for the GDC Landfill.

Mr. Finton noted that the site was in poor condition as wastes were being placed on two (2) working faces. Furthermore, daily cover was not being maintained and blowing paper was not being controlled.

November 17, 1975

Representatives of the ISBH met with Mr. Hagen of GDC. Mr. Hagen was ordered to stop accepting unauthorized hazardous waste streams. Also, Mr. Hagen was told to install groundwater monitoring wells and to improve the daily cover provided to the wastes disposed.

December 2, 1975

The GDC Landfill was inspected by Mr. Dayhuff at 12:00pm. Mr. Dayhuff observed the GDC Landfill for approximately twenty (20) minutes and did not observe any liquid or sludge wastes entering the GDC Landfill.

January 12, 1976

After subsequent inspections revealed no improvement in the operation of the GDC Landfill, GDC was ordered to cease all dumping of liquid sludge and hazardous waste immediately.

January 22, 1976

An inspection of the GDC Landfill was conducted by Messrs. Dayhuff and Finton at 1:30pm. They noted that General Drainage had transported an industrial waste from American Maize to the GDC Landfill. Also, they observed that Industrial Disposal had transported a lime slurry waste to the GDC Landfill. Both wastestreams were unacceptable for disposal at the GDC Landfill as they had not been pre-approved.

January 26, 1976

An inspection of the GDC Landfill was conducted. An unapproved lime slurry waste was observed as being on-site during the inspection. *[Find this inspection report. Is this the January 22, 1976 report?]*

February 11, 1976

An inspection of the GDC Landfill was conducted at 3:30pm by Mr. Dayhuff. Mr. Dayhuff observed surface water draining over and through the solid wastes. Also, paper was noted as blowing around the GDC Landfill.

February 20, 1976

A Violation Letter was issued to GDC delineating problems associated with leachate, daily cover, blowing paper, and the continuing need for the installation of a groundwater monitoring system. Specifically, GDC was accepting liquid, sludge, and hazardous waste in violation of SPC-18, Chapter V.

February 26, 1976

Mr. Dayhuff inspected the GDC Landfill at 4:00pm and found it to be "in relatively poor shape." Mr. Dayhuff noted three (3) problems. First, Mr. Hagen was using the northeast portion

of the site for disposal of bulky, metal, and industrial wastes. Furthermore, it was observed that this area had not been equipped with an underfill drain and was leaching badly.

The second problem surrounded the leachate disposal. Mr. Dayhuff noted that the leachate generated from both the northeast portion and main portion of the GDC Landfill was being pumped directly into the Grand Calumet River. Mr. Dayhuff observed that GDC's leachate monitoring program was to begin on May 1, 1976 and that an alternative method for treatment and disposal of the leachate would have to be considered.

The last problem identified by Mr. Dayhuff was "a body of evidence" that was developing indicating hazardous industrial liquid and sludge wastes being disposed at the GDC Landfill without approval. Mr. Dayhuff noted that paint sludge from American Chemical Services in Griffith, Indiana had been accepted for disposal at the GDC Landfill.

March 9, 10, and 12, 1976

In an effort to determine which entities were using the GDC Landfill and their associated waste streams, Mr. Dayhuff observed trucks entering the GDC Landfill. Mr. Dayhuff reported the following:

- | | |
|-------------------------|-----------------------------------|
| 1. City of Hammond | garbage trucks |
| 2. City of Hammond | street department trucks |
| 3. Industrial Disposal | trash, debris, garbage |
| 4. Industrial Disposal | sludge |
| 5. General Drainage | liquid |
| 6. Calumet Wastes, Inc. | trash, garbage, industrial wastes |
| 7. Calumet Wastes, Inc. | sludge |
| 8. Independent Wastes | garbage |

Mr. Dayhuff noted that General Drainage was, by far, the most frequent disposer of liquids and sludges at the GDC Landfill. Mr. Dayhuff estimated that General Drainage was disposing of between 15,000 and 20,000 gallons of liquids per day.

April 5, 1976

An inspection of the GDC Landfill was conducted at 2:30pm by Mr. Dayhuff. Mr. Dayhuff noted that "bulky wastes" were being disposed at an area adjacent to the railroad tracks and, furthermore, daily cover was being applied but was not adequate.

April 12, 1976

A letter was issued to Mr. William Bogner, General Drainage, 1520 Blaine Street, Gary, Indiana, 46406, from Mr. Dove regarding the approval for disposal of paint sludges from

American Chemical Service, Griffith, Indiana at the GDC Landfill. The approval noted that the GDC Landfill could only accept twenty five (25) cubic yards per day.

May 11, 1976

An inspection of the GDC Landfill was conducted at 10:45am by Mr. Dayhuff. He observed that the dewatering process at the GDC Landfill had included the leachate that was generated and, subsequently, the mixture was being pumped into the Grand Calumet River.

May 12, 1976

Mr. Dayhuff obtained eleven (11) water samples from the GDC Landfill. Mr. Dayhuff observed a discharge from the GDC Landfill into the Grand Calumet River. *[Place results here as contained within a table.]*

May 26, 1976

An inspection of the GDC Landfill was conducted by Mr. Dayhuff at 2:00pm. He noted that a disposal area on the east portion of the GDC Landfill was not covered with sufficient daily cover.

July 14, 1976

Messrs. Dayhuff and Bruce Palin inspected the GDC Landfill at 11:45am. He observed that GDC was using sand for daily cover. Additionally, he observed two (2) trucks from Industrial Disposal enter the site and dispose of approximately two thousand (2,000) gallons of an oily liquid. Mr. Dayhuff subsequently contacted Mr. Dan McCartle of Industrial Disposal to determine the origin of the oily liquid. Mr. McCartle stated that the liquid came from Youngstown Sheet & Tube Company, but was unable to identify the specific liquid disposed at the GDC Landfill. Mr. Dayhuff proceeded to contact Mr. Carl Broman of Youngstown Sheet & Tube Company. Mr. Broman stated that the liquid waste was a mixture of iron scale, lubricating oil, and rolling solution. Mr. Broman also stated that they were not "reporting" this waste, but would do so if asked.

In this memo to Mr. Jim Hunt, dated August 5, 1976, Mr. Dayhuff noted that the GDC Landfill would be cited for accepting the oily liquid without approval. Furthermore, Mr. Dayhuff explained that he would be meeting with Mr. Broman on July 29, 1976 to discuss "filing procedures" for Youngstown Sheet & Tube Company.

August 9, 1976

A letter was issued to Mr. Gary Schepper of the Conservation Chemical Company (P.O. Box 6066, Gary, Indiana, 46406) from Mr. Roland P. Dove, Director, Division of Sanitary

Engineering, ISBH, regarding a request to dispose of liquid and sludge wastes at the GDC Landfill. The letter stated that the request was denied because (1) the liquid wastes were acids with a pH ranging from 0.5 to 1.8, and (2) the sludges were hydroxide plating wastes requiring a separate area for disposal. The letter noted it was understood by the ISBH that the aforementioned wastes were currently being disposed at the CID Landfill in Illinois.

August 10, 1976

Messrs. Palin and Dayhuff inspected the GDC Landfill at 2:15pm and spent approximately two (2) hours observing trucks entering the GDC site. They identified the following shipments by Industrial Disposal: six (6) loads, approximately forty (40) cubic yards each, of Georgia Pacific sludge (noted as having the consistency of moist blue clay); two (2) loads of liquid oil sludge; and one (1) load of lime sludge from Union Carbide. Mr. Dayhuff estimated that approximately one hundred thousand (100,000) cubic yards of Georgia Pacific sludge had been disposed at the GDC Landfill within the past seven (7) days. It was observed that the Georgia Pacific sludge was being used for constructing wind walls and for intermediate cover.

The inspection also revealed a large hole approximately fifty (50) feet by eighty (80) feet within the general refuse disposal area. The identified hole retained a black oil waste which Mr. Hagen claimed was transported by General Drainage from the sewers at the Shell Oil Refinery. The hole was also filled with ten (10) fifty-five (55) gallon drums.

Mr. Hagen was reminded that he is not to accept any liquid, sludge, or other hazardous wastes without prior written approval.

Messrs. Palin and Dayhuff traveled to the origin of the Georgia Pacific sludge drying beds at the intersection of Clark Road and Industrial Highway. Industrial Disposal's equipment was observed digging out the Georgia Pacific sludge lagoons.

August 13, 1976

Mr. David Lamm received a telephone call from Mr. Dick Cleaton regarding the GDC Landfill. First, Mr. Cleaton advised that a waste hauler by the name of Mr. Frank had a vast amount of information concerning the illegal disposal operations by the GDC Landfill. Mr. Cleaton was scheduled to discuss the information in greater detail with Mr. Frank. Second, Mr. Cleaton noted that Mr. Ernie DeHart now has all of Mr. Steve Martell's solvent business and Mr. DeHart is now using the 15th & Cline Street Dump. Additionally, Mr. DeHart periodically transports solvents to the GDC Landfill. Lastly, Mr. Cleaton noted that the Georgia Pacific paper sludge was still being transported to and disposed at the GDC Landfill.

August 26, 1976

Mr. Palin obtained six (6) water samples from the GDC Landfill revealing significant amounts of heavy metals and oils being pumped into the Grand Calumet River. Specifically, the results were:

Sample Identification	pH	Hex. Chrome PPM	Total Chrome PPM	Lead PPM	Cadmium PPM	Arsenic PPM
Well-West Bank of Pit	7.8	0.08	0.08	0.09	1.12	0.013
Well-North Bank of Pit	6.4	0.03	0.08	0.008	1.12	0.0
Well-East Bank of Pit	7.15	0.02	0.02	0.01	1.12	0.0
Well-South Bank of Pit	6.5	0.03	0.03	0.0	0.1	0.0
Perimeter out pest	7.65	0.02	0.07	0.12	0.1	0.36
Well at bldg.	7.1	0.06	0.06	1.0	0.1	0.0

September 20, 1976

A letter was issued to Mr. Hagen from Mr. Lamm, Acting Chief, Solid Waste Management Section, Division of Sanitary Engineering, ISBH, notifying him that the permit for the GDC Landfill will expire on February 1, 1977.

October 5, 1976

Mr. Palin inspected the GDC Landfill at 1:00pm and noted a steaming pile of aluminum dust in a separate area of the site. Upon questioning, Mr. Hagen revealed that the aluminum dust originated from U.S. Reduction and that an approval letter had not been secured. Mr. Palin also observed an oily substance accumulated within the general disposal area. Mr. Hagen was questioned as to why the oily substance was not situated within a separate disposal area. He responded that the oily substance was oil from catch basins that were cleaned by General Drainage and that staff members [*staff of the GDC Landfill or staff from General Drainage?*] instructed him to mix the oily substance with the general refuse.

Mr. Palin, lastly, informed Mr. Hagen of the results from the water sampling performed on August 26, 1976. The results obtained from the outfall adjacent to the Grand Calumet River indicated that the site was polluting the River.

October 6, 1976

Mr. Lamm received a telephone call from Ms. Carol Pearce, Office of the Attorney General, State of Illinois ((312) 793-2491), regarding her observation of water discharging from the GDC Landfill into the Grand Calumet River. She noted that she had received complaints from individuals on the Illinois portion of the River. Further, she questioned whether GDC had a NPDES permit to discharge into the Grand Calumet River.

October 8, 1976

Mr. Lamm spoke with Mr. Dove regarding the questions posed by Ms. Pearce on October 6, 1976. The question of the legality of GDC discharging into the Grand Calumet River was of prime concern.

October 20, 1976

A letter was issued to Ms. Pearce (188 West Randolph Street, Suite 2315, Chicago, Illinois, 60609) from Mr. Hert enclosing analyses of the water samples taken from the GDC site on May 13 and August 27, 1976. Mr. Hert noted that, at that time, the GDC site did not possess a NPDES permit.

October 27, 1976

Messrs. Palin and Dayhuff inspected the GDC Landfill and informed Mr. Hagen that the discharging of water from the site into the Grand Calumet River was a violation of Indiana law. Mr. Hagen was reminded that the construction plans for the GDC Landfill called for the leachate to be collected and transported to the East Chicago Sanitary District. Furthermore, Messrs. Palin and Dayhuff noted other deficiencies of the construction plans, including (1) the sides of the GDC Landfill were to be sealed with clay; (2) a perimeter dewatering system was to be installed outside the clay barrier; and (3) an on-site leachate collection system was to be installed.

Messrs. Palin and Dayhuff also observed a pit that Mr. Hagen had excavated. Mr. Hagen was placing approved and unapproved sludges into this pit. The sludges that were approved for disposal were required to be mixed with the general refuse and disposed within a separate area, not into the newly excavated pit.

October 29, 1976

Mr. Lamm received a telephone call from Ms. Pearce regarding current enforcement actions by ISBH against the GDC Landfill.

November 5, 1976

A Violation Letter was issued to Mr. Hagen from Mr. Lamm for violation of Chapter 4, Section 1(a) of the Environmental Management Act. This section stated:

"No person shall discharge, emit, cause or allow any contaminant or waste, either alone or in combination with contaminants from other sources, into the environment in any form which would cause pollution."

This violation was determined based upon the results of the analysis of water samples obtained on August 26, 1976. The letter requested that Mr. Hagen notify ISBH within fifteen (15) days to discuss the corrective action to be initiated.

November 17, 1976

A letter was issued to Mr. Hagen from Mr. Lamm stating that the industrial wastes approved for disposal at the GDC Landfill were to be mixed with the general refuse and not placed within a separate disposal area [see October 27, 1976 entry]. The letter required Mr. Hagen to cover the separate area trench with two (2) feet of compacted clay within thirty (30) days.

December 1, 1976

Mr. Dayhuff issued a memorandum to the GDC Landfill file. The memorandum requested that the disposal of liquid oil waste at the GDC Landfill be ceased. He noted that he and Mr. Palin had been aware since July 14, 1976, of the disposal of liquid oil waste by Industrial Disposal at the GDC Landfill. Mr. Dayhuff noted that Industrial Disposal trucks have been observed at the site during the majority of the inspections. Oil from the GDC Landfill was moving into the dewatering system and is subsequently being pumped into the Grand Calumet River.

December 2, 1976

Representatives from the Indiana State Board of Health met with Mr. Hagen to discuss the discharge of GDC Landfill leachate into the Grand Calumet River. Mr. Hagen stated that he was issuing a complaint to the Governor and would not be taking any action until he discussed the matter with his lawyer.

December 14, 1976

A letter from Mr. Oral Hert was issued to Mr. Hagen of GDC citing its continued lack of compliance and, further, stating that his operating permit would not be renewed if the discharging was not terminated. Mr. Hagen did not respond to the letter within the timeframes specified.

December 28, 1976

Messrs. Palin, Dove, Lamm, Dayhuff, Johnie Baker, and Larry Brnicky toured several land disposal sites in Lake County, including Industrial Cinders, Bongi Dump, Industrial Disposal, Midco, Red Top Trucking, Martell Dump, Gary Dump, Lake Sandy Jo, Mose Richards, Black Oak Landfill, East Chicago Dump, Amoco Dump, and the GDC Landfill.

Later in the evening, they interviewed Mr. Bill Petrick, a representative of Liquid Waste Haulers. He stated that the GDC Landfill was "the biggest offender as far as accepting industrial wastes."

January 18, 1977

A Notice of Hearing and Violation, Cause No. B-406 was filed by the SPCB.

January 20, 1977

An inspection of the GDC Landfill was conducted by Mr. Palin at 1:40pm and 3:00pm. Mr. Palin was unable to conduct an inspection, apparently, because Mr. Hagen was not present at the site. Upon leaving the GDC Landfill, Mr. Palin observed a "liquid wastes" tanker truck from Illinois.

February 16, 1977

A memorandum was issued from Mr. Lamm to Mr. Robert G. Grant, Legal Section, ISBH, regarding the fact that the GDC Landfill had never received a Department of Natural Resources ("DNR") permit to construct within a floodplain.

March 2, 1977

A pre-hearing conference was held between representatives from ISBH and Mr. Hagen to prepare an Agreed Order for the resolution of, among other items, leachate discharges and improper acceptance of industrial waste.

March 4, 1977

A letter was issued to Mr. Hagen from Mr. Dove regarding the disposal of oil sludges from Youngstown Sheet & Tube. The letter noted that, until a solution for the disposal of the oil sludges could be found, GDC would be allowed to accept such oil sludges from only Youngstown Sheet & Tube for an interim period. This approval was granted upon the condition that the oil sludges be mixed with the general refuse and the entire working area compacted and covered in accordance with SPC-18. [See September 6, 1977 entry.]

March 9, 1977

A letter was issued to Mr. Hagen from Mr. Dove regarding the disposal of terminal treatment plant sludge from U.S. Steel. The letter granted interim approval for disposal of the terminal treatment plant sludge at the GDC Landfill until ISBH could complete an analysis of the chemical content of the waste. The letter noted that the waste should be mixed with the general refuse and covered daily.

March 11, 1977

A letter was issued to Messrs. Baker and Hunt from Mr. William C. Child, Northern Region Manager, Land Field Operations Section, Division of Land/Noise Pollution Control, Illinois Environmental Protection Agency, regarding the alleged disposal of various wastes at the GDC Landfill that had originated in Illinois.

The list attached to the letter noted various facilities that had generated and transported wastes to the GDC Landfill. The generators included:

1. Dreeblan Paint Company (paint washings)
2. Baron-Blakeslee Company (still bottoms)
3. Howell Company (nickel cleaner)
4. Hills McCanna Company (soluble oils)
5. Benjamin Moore & Company (wash thinners)
6. National Precision Circuits (CuNH_4 Persulfate)
7. Ansul Corporation (phenolic waste)
8. National Can Company (oil and water wastes)
9. Western Electric-Hawthorne Works (wire mill wastes)
10. Staley Chemical Company (industrial sludge)
11. H.P. Smith Paper Company (drum sludge)
12. Spot Nails (caustic sludge)
13. Union Special Corporation (soluble oils)
14. Allis-Chalmers (chrome sludge)
15. Delco Electronics (methanol and water)
16. Danly Machine Corporation (oil and waste water)

[Ansul Corporation is located in Marinette, Wisconsin and the disposal site was listed as "unknown." National Can Company is located in LaPorte, Indiana as the disposal site was listed as "various locations." The H.P. Smith Paper Company disposal site was listed as Midwest Solvent Recycling Corporation (MIDCO). Allis-Chalmers is located in LaPorte, Indiana. Delco Electronics is located in Kokomo, Indiana and the disposal site was listed as "incinerator in Northern Indiana."]

The transporters of waste to the GDC Landfill included:

1. Liquid Waste (Franklin Park, Illinois)
2. Conservation Chemical
3. Scrap Haulers Corporation (Riverdale, Illinois)
4. D&J Refuse (South Holland, Illinois)
5. Liquid Engineer Company
6. General Drainage, Inc. (Gary, Indiana)
7. Indiana Sanitation

March 14, 1977

A letter was issued to Mr. Hagen from Mr. Dove regarding the GDC Landfill's temporary approval to accept and dispose of lime waste from C. F. Petroleum. The temporary approval was granted on the condition that the lime waste be mixed with the general refuse. The letter noted that C. F. Petroleum generated the lime waste at a rate of approximately eighty thousand (80,000) gallons per month. [*Determine the nature of the lime waste and its specific point of generation.*]

A letter was issued to Mr. R. D. Steels, U.S.S. Lead Refinery, Inc., 5300 Kennedy Avenue, East Chicago, Indiana, 46312, from Mr. Dove regarding a phone conversation with Mr. Palin on March 8, 1977. The letter granted U.S.S. Lead Refinery, Inc. approval to dispose of its calcium sulfate waste at the GDC Landfill. The letter noted that the calcium sulfate waste was generated at a rate of approximately one and one-half (1.5) tons per day. The approval letter was conditioned on the moisture content of the calcium sulfate waste being enough to prevent dust problems and that the calcium sulfate waste be mixed with the general refuse. [*Reference EPA Compliance Order No. RCRA-V-W-86-R-45.*]

March 21, 1977

A letter was issued to Mr. Hert from Ms. Pearce regarding an update on pending enforcement actions against the GDC Landfill.

March 29, 1977

An inspection of the GDC Landfill was conducted at 9:10am by Mr. Palin. He noted that GDC was hauling sand from the bottom of the GDC Landfill.

March 31, 1977

Mr. Lamm spoke with Mr. Grant regarding the pending Agreed Order with GDC. Mr. Grant noted that it had been mailed to GDC for signature. Further, if it was not signed and returned by May 1, 1977, then Mr. Grant would initiate hearing proceedings.

April 12, 1977

Mr. Palin spoke with Mr. Tite regarding the GDC Landfill. Mr. Tite stated that Mr. Hagen had requested that Mr. Tite evaluate options for correcting the illegal discharge and leaching of pollutants onto the site from the adjacent property [*Vulcan Materials*]. Mr. Tite noted that he had several ideas, but each would be expensive to implement.

April 13, 1977

Mr. Palin telephoned Mr. Joe Kreiger in the Facilities Inspection Section to discuss the progress he had made with moving Vulcan Materials pit into compliance and ceasing the leaching from their pit into the GDC Landfill. Mr. Kreiger stated that Mr. Cleaton had been working with Vulcan Materials and had requested that they submit plans for proper construction of the pit.

April 25, 1977

A letter was issued to Mr. W. P. Thomas, Vice President of Operations, Energy Cooperative, Inc., 3500 Indianapolis Boulevard, East Chicago, Indiana, 46312 ("Energy Co-op"), from Mr. Dove regarding the approval to dispose of Energy Co-op's activated biological sludge at the GDC Landfill. The approval letter noted that disposal of the activated biological sludge was normally conducted through incineration [*most likely at the East Chicago Incinerator*], and that disposal at the GDC Landfill should be conducted only during times when the incinerator is inoperable. Furthermore, the approval letter noted that the activated biological sludge waste should be dewatered and in solid form before it is hauled to the GDC Landfill for disposal. Lastly, the activated biological sludge waste should be mixed with the general refuse and covered at the end of the working day.

April 27, 1977

Mr. Lamm telephoned Mr. William Baker, Sr., regarding the status of the Agreed Order issued to GDC. Mr. Baker noted that Mr. Hagen had objections to the Agreed Order and was instructed by Mr. Lamm to state those objections in writing to the ISBH.

May 17, 1977

A letter was issued to Mr. P. Zaccari, Industrial Rubbish Removal, 25W175 West Lake Street, Roselle, Illinois, 60172, from Mr. Dove regarding the approval to dispose of asbestos paper from the Borg-Warner plant in Bellwood, Illinois at the GDC Landfill. The approval letter noted that only one hundred and five (105) cubic yards per week of the asbestos paper waste would be allowed to be disposed at the GDC Landfill. The letter noted that the asbestos was bound in the paper with latex.

May 26, 1977

Mr. Palin conducted an inspection of the GDC Landfill at 12:55pm. Mr. Palin noted two (2) violations, including GDC's failure to properly compact the solid waste, and GDC's failure to provide adequate daily cover. GDC was using sand as daily cover.

June 1, 1977

A letter was issued to Mr. Walter Skibs, Energy Co-op, from Mr. Dove regarding a May 23, 1977 phone conversation with Mr. Palin. The letter granted approval for Energy Co-op to dispose of its lime sludge waste, generated as a result of a hot lime water softening process, at the GDC Landfill. The approval letter noted that Energy Co-op generated approximately eighty thousand (80,000) gallons of lime sludge waste per month. The approval letter specified that no more than four thousand (4,000) gallons per day of the lime sludge waste could be disposed at the GDC Landfill. Lastly, the approval letter required GDC to mix the lime sludge waste with the general refuse.

June 3, 1977

A letter was issued to Mr. Skibs, Energy Co-op, from Mr. Dove regarding a telephone conversation with Mr. Palin on May 23, 1977. The letter granted approval for Energy Co-op to dispose of its API separator bottoms waste at the GDC Landfill. The letter noted that Energy Co-op generates approximately two hundred (200) cubic yards per year of the API separator bottoms waste. The approval letter noted that the API separator bottoms waste should be mixed with the general refuse prior to disposal.

July 22, 1977

A letter was issued to Mr. W. A. McFarland, Manager, Quality Control, Vulcan Materials Company, 459 North Cline Avenue, Gary, Indiana, 46406 ("Vulcan"), from Mr. Dove regarding the receipt of a letter from Vulcan dated June 30, 1977. The letter to Mr. McFarland noted that Vulcan had been previously granted temporary approval for the disposal of filter cake waste and kiln scrubber waste at the GDC Landfill. *[Determine the nature of both waste streams, and find a copy of the June 30, 1977 letter.]* The letter noted the receipt and subsequent review of the two (2) above-noted wastes, and stated that both the filter cake waste and kiln scrubber waste could continue to be disposed at the GDC Landfill. Lastly, the letter noted approximately fifteen hundred (1,500) pounds of the filter cake and three thousand (3,000) pounds of the kiln scrubber waste were generated per week for disposal at the GDC Landfill.

August 1, 1977

Mr. Palin telephoned Mr. Grant to determine the status of the GDC hearing before the SPCB. Mr. Grant advised that Vulcan Materials and GDC were to be scheduled for hearing together. Mr. Grant believed the next SPCB meeting would occur after August 16, 1977.

August 8, 1977

Mr. Palin conducted an inspection of the GDC Landfill at 1:45pm. Mr. Palin observed that the Vulcan pit west of the GDC Landfill was full of water and still leaching into the GDC Landfill pit.

September 6, 1977

A letter was issued to Mr. Carl Broman, Youngstown Sheet & Tube Company, 3001 Dickey Road, East Chicago, Indiana, 46312, from Mr. Hert regarding the approval to dispose of oily waste from the 6-Stand Oil Recovery Unit at the GDC Landfill. This oily waste previously temporarily approved for disposal at the GDC Landfill on March 4, 1977. The letter noted that the ISBH determined that the GDC Landfill was capable of absorbing the oily waste from the 6-Stand Oil Recovery Unit. The letter further noted that approximately twelve hundred (1,200) gallons per day of the oily waste was generated by Youngstown Sheet & Tube Company for disposal at the GDC Landfill.

November 18, 1977

A letter was issued to Mr. Wayne Slager, Calumet Waste Systems, P.O. Box 4147, Hammond, Indiana, 46324, from Mr. Hert regarding the one-time disposal of one hundred and twenty (120) cubic yards of herbicide waste from E. I. DuPont DeNemours Company, Inc. at the GDC Landfill. Mr. Slager had previously requested permission to dispose of the herbicide waste at the GDC Landfill through a letter dated October 31, 1977. *[Obtain the October 31, 1977 letter and determine the exact nature of the particular herbicide.]*

October 20, 1977

Messrs. Palin and King performed an inspection at the GDC Landfill at 2:00pm. Messrs. Palin and King observed two (2) violations, including open burning and failure to provide adequate layering and compaction of the solid waste. The inspection report noted that a fire was burning, but did not specify the origin nor location.

December 6, 1977

A memorandum entitled, "Geologic Description and Evaluation" from Mr. Jim King of the Indiana State Board of Health was sent to the GDC public file. What follows is quoted directly from the "Evaluation and Recommendation" section of this memorandum.

This site is definitely geologically unacceptable for waste disposal and is a hazard to groundwater and surface water resources in its vicinity. Groundwater is currently collected in sumps and is pumped into the [Grand Calumet] river at a rate of about 1,000 gpm during the wettest part of the year. After the site is abandoned and pumping ceases, water levels will recover to their pre-dewatering levels and will saturate the filled area. The existence of seepage from the river and local industries into the pit provides obvious evidence of the high permeability of the sand unit into which the refuse is being placed. In June of 1973, the site manager was directed to monitor the quality of water pumped from the pit area into the river and, to date, has not complied. Five monitoring wells have been installed around the site's perimeter, but sample analyses have been submitted sporadically. Water analyses received thus far show little water quality degradation, but some primary leachate indicators are absent from these reports. Among other problems documented at this site are the use of sand as cover material and the acceptance of hazardous wastes. Under no circumstances should hazardous wastes be accepted at this site at any time. In addition, a permit from the Department of Natural Resources for floodplain alteration has never been acquired.

I strongly advise that this site institute closure procedures immediately because of the health threat it poses. The problems resulting from the poor geologic environment are further compounded by a lack of willingness of the part of the landfill personnel to adhere to good operational procedures.

December 28, 1977

An inspection of the GDC Landfill was conducted at 2:15pm by Messrs. Palin and Tim Kelley. They observed that GDC was landfilling via the "cliff" method. Additionally, a trench had been made in an old disposal area that was being utilized for the disposal of liquid wastes. A total demerit score of nine (9) was calculated.

March 15, 1978

Mr. Palin conducted an inspection of the GDC Landfill at 2:15pm. Mr. Palin calculated a demerit score of seventeen (17) for the GDC Landfill and noted this as unacceptable. Mr. Palin observed that the northeast corner of the current fill area was uncovered and that several underground fires were ongoing at various locations on-site. Additionally, three (3) pits had been excavated at completed areas of the GDC Landfill and filled with oily waste. Furthermore, Mr. Palin noted that the area between the fill area and the east wall of the GDC Landfill had standing or ponded water. Lastly, Mr. Palin determined that staff of the GDC Landfill had been working the refuse by utilizing the "cliff" method.

March 17, 1978

A meeting to discuss the impending litigation over the GDC Landfill was held by staff of the ISBH. Messrs. Grant, Lamm, Joseph Stallsmith, Joseph Snyder, and Joseph Kreiger, among others, attended the meeting.

April 7, 1978

Mr. Palin inspected the GDC Landfill at 10:15am. Mr. Palin provided the GDC Landfill with a demerit score of nine (9), an unacceptable rating, because of a lack of daily cover in a particular area. Mr. Palin also observed the unpermitted discharge of pollutants into the Grand Calumet River and obtained a sample from the discharge pipe. *[It is unclear to which pipe Mr. Palin was referring]*. The analysis (Lab Analysis No. 0459) of the sample obtained from the discharge pipe revealed:

1.	arsenic	0.035 mg/L
2.	chlorides	1600.0 mg/L
3.	chromium	0.10 mg/L
4.	iron	7.0 mg/L
5.	lead	<0.02 mg/L
6.	manganese	1.2 mg/L
7.	nickel	0.48 mg/L
8.	zinc	0.14 mg/L

April 18, 1978

Mr. Palin issued a memorandum to Mr. John Pruessner regarding the disposal of asbestos from Borg Warner at the GDC Landfill. Mr. Palin was informed by Mr. Hagen that GDC accepted roughly thirty (30) cubic yards every two (2) weeks from the gasket division of Borg-Warner. The asbestos, according to Mr. Hagen, originated from the cuttings of the asbestos gaskets which are impregnated with a resin to bind the asbestos fibers together.

May 8, 1978

A letter was issued to Mr. Palin from Mr. Ronald Novak, Chief, Hammond Air Pollution Control, regarding a complaint received on May 6, 1978, of a human waste odor alleged to have been emanating from the GDC Landfill. Allegedly, the odor could be detected as far from the GDC Landfill as Munster, Indiana. Mr. Novak stated that he personally investigated and confirmed the source of the odor as the GDC Landfill. Mr. Novak requested that ISBH formally investigate the situation.

May 9, 1978

Mr. Palin inspected the GDC Landfill at 4:45pm in an effort to determine the cause of the odor problem. Mr. Palin, upon arrival, could not detect an odor nor could he determine an origin

to the odor. Mr. Hagen informed Mr. Palin that he believed the source of the odor had been the Gary Sewage Treatment Plant. Mr. Hagen noticed the smell at approximately 5:30pm on May 6, 1978. He drove around and noticed the smell appeared to come from below Fifth Street on Cline Avenue. Mr. Palin drove to the Gary Sewage Treatment Plant, but was unable to detect any odors.

Regarding the GDC Landfill inspection, Mr. Palin calculated a total demerit score of ten (10), an unacceptable rating. Mr. Palin noted that the method of disposal for oily wastes is causing a smell as the refuse is excavated. Lastly, Mr. Palin observed that GDC needed to clean up the oily sludge at the base of the Landfill.

May 24, 1978

A letter was issued to Mr. Novak from Mr. Lamm regarding Mr. Palin's inability to trace the origin of the odor which was alleged to have emanated from the GDC Landfill.

June 20, 1978

Mr. Palin conducted an inspection of the GDC Landfill at 2:30pm. According to the inspection report, an unidentified individual broke into the GDC Landfill on June 18, 1978, and disposed of a load of brown foamy liquid into the sump area of the Landfill. According to Mr. Palin, this substance made his eyes burn and caused a blue smoke to emanate from the sump area. *[It is assumed that the brown foamy liquid was present during Mr. Palin's inspection of the GDC Landfill.]* The brown foamy liquid was pumped out of the sump area and directly into the Landfill. This incident was reported to the Gary Police Department. Lastly, Mr. Palin observed that adjacent U.S. Reduction was generating a significant amount of dust.

August 17, 1978

An inspection was conducted at 5:00pm by Mr. Palin at the GDC Landfill. During this inspection, the operator of the GDC Landfill indicated that the discharge from the sump into the Grand Calumet River occurred approximately three (3) hours each day. Mr. Palin noted that GDC was laying a clay wall for the east side of the GDC Landfill.

September 12, 1978

Mr. Guinn Doyle, ISBH, received a telephone call from Ms. Patrice Fletcher, a representative from Channel 2 in Chicago, Illinois regarding the GDC Landfill. Ms. Fletcher was informed that the SPCB had taken action against GDC for an unpermitted discharge. Ms. Fletcher also inquired as to actions taken against Illinois transporters for illegal disposal at the GDC Landfill.

September 26, 1978

A letter was issued to Dr. Earl N. Caldwell, Health Commissioner, Gary Health Department, 1145 West 5th Avenue, Gary, Indiana, 46402 from Mr. Lamm regarding liquid waste seepage near Cline Avenue and the Grand Calumet River. Mr. Lamm noted that ISBH was unable to perform tests on the submitted sample because of an insufficient amount of the sample and a lack of preservative within the sample itself.

October 20, 1978

Mr. Palin received a telephone call from Ms. Janet Keck of the Hammond Times. She inquired about Calumet Container and their sludge which was to be allegedly placed within a roll-off container then have crushed drums placed on top of such sludge. Ms. Keck questioned whether the GDC Landfill needed a permit for such wastes, noting that the waste might be flammable. Mr. Palin responded that he did not think a permit was necessary.

November 30, 1978

An inspection was conducted of the GDC Landfill by Messrs. Palin and Hunt at 4:12pm at the GDC Landfill. Mr. Palin noted that GDC was managing oil sludge via a pond.

January 3, 1979

An inspection of the GDC Landfill was conducted by Mr. Oliver at 3:30pm. Mr. Oliver noted that the aluminum dross waste was continuing to be disposed at the GDC Landfill without any adverse impacts. Mr. Oliver noted that paper continued to be a problem. A total demerit score of three (3) was calculated and the GDC Landfill was rated as acceptable.

February 13, 1979

Mr. Palin received a telephone call from Mr. Hagen regarding a January 26, 1979, letter issued by Mr. Palin to Mr. Hagen regarding the disposal of wastewater from LaSalle Steel. Mr. Hagen advised that he had called Mr. Jack Hall at LaSalle Steel and Mr. Bill Bogner at General Drainage to determine the final disposition of the wastewater because, Mr. Hagen contended, he had not received such waste from LaSalle Steel. Mr. Hagen informed Mr. Palin that Mr. Bogner's secretary had made an error on the SPC-17 report form and the wastewater from LaSalle Steel was actually disposed at the CID Landfill in Illinois.

March 1, 1979

A letter was issued to Mr. Steve Zlatos, Deputy Attorney General, from Mr. Joseph W. Karen, Hearing Officer, SPCB, regarding the Notices of Hearing, Cause No. B-406, issued to GDC on February 3, 1977, and July 27, 1978. Mr. Karen requested that the four (4) attached Summary of Evidence Sheets be completed and returned in lieu of the forthcoming hearing. The factual issues included:

1. That GDC failed to construct or operate two (2) separate collection systems for dewatering and leachate per the approval letter issued on June 21, 1973;
2. That GDC pumped leachate to the Grand Calumet River instead of trucking the leachate to the Gary Sanitary District as required by the approval letter of June 21, 1973;
3. That GDC accepted liquids, sludges, and other hazardous wastes; and
4. That GDC operated a landfill without a valid SPC-18 operating permit.

April 18, 1979

An inspection of the GDC Landfill was conducted by Mr. Palin at 10:15am. Mr. Palin calculated a total demerit score of ten (10) for the GDC Landfill, an unacceptable rating. Mr. Palin observed that GDC was constructing a clay wall, approximately eight (8) to ten (10) feet in thickness, along the north side of the pit. The drainage from the bottom of the pit was draining into the discharge pit. Mr. Palin noted that the drainage pipe was not installed between the clay wall and the sand wall. Furthermore, the clay wall did not exist around the entire perimeter of the GDC Landfill.

May 10, 1979

A Notice of Violation and Proposed Agreed Order, Cause No. B-406, was issued to GDC by ISBH. [*Find this Notice of Violation and Agreed Order.*]

June 15, 1979

Messrs. Palin and Oliver, and Mr. Dan Miller, Indiana Attorney General's Office, met at 11:00am with Messrs. Hagen and David Cohen, Mr. Hagen's attorney (3701 Main Street, East Chicago, Indiana, 46312), at Mr. Cohen's office to discuss the various violations observed at the GDC Landfill. It was determined that an Agreed Order could be crafted to allow the site to continue to operate. The Agreed Order would contain the following provisions:

1. the violation of accepting hazardous waste will be dropped and a substantial fine shall be assessed for future violations;
2. a Construction Plan Permit amendment will be submitted addressing the correction of the leachate and groundwater problems;
3. the Agreed Order shall serve as an operating permit; and

4. a \$1,000 fine shall be assessed for the discharge of contaminants into the Grand Calumet River.

August 24, 1979

An inspection of the GDC Landfill was conducted by Mr. Oliver at 9:00am. He calculated a total demerit score of sixteen (16), an unacceptable score. Mr. Oliver observed four (4) acres of compacted, but uncovered refuse on the northeastern portion of the GDC Landfill. Also, he noted trenches being dug into the clay bottom of the GDC Landfill were filling with water. Lastly, Mr. Oliver noted that truck drivers were scavenging, a practice that was not allowed.

October 30, 1979

An inspection of the GDC Landfill was conducted by Mr. Oliver at 11:00am. Mr. Oliver noted that the hazardous waste being disposed on-site needed to be placed with the other solid waste and covered at the end of the day. Additionally, Mr. Oliver observed that approximately one (1) acre of the GDC Landfill was exposed on the northeastern corner. Lastly, a trench that had been excavated in an old portion of solid waste was being utilized to dispose of oil. A total demerit score of ten (10) was calculated, an unacceptable rating.

November 8 & 9, 1979

Mr. Oliver had several conversations with representatives of both the U.S. Reduction Company and Industrial Disposal, Inc. regarding the disposal of an aluminum oxide material at the GDC Landfill. Mr. Oliver had learned that the aluminum oxide material contained thirty (30) to forty (40) percent chloride salts that produced an exothermic reaction when disposed with the general refuse. Mr. Oliver noted that this aluminum oxide material was not the material approved in the June 16, 1976 letter which was approved at three (3) to six (6) percent chloride salts. Mr. Dan McCartle of Industrial Disposal, Inc. and representatives from U.S. Reduction requested that ISBH allow the GDC Landfill to accept this waste until November 19, 1979, at which time all parties would meet to discuss an appropriate course of action. Mr. Oliver informed Mr. McCartle and Mr. Julius Gordon (U.S. Reduction) that the aluminum oxide waste could not be disposed at the GDC Landfill unless it had received previous approval.

November 16, 1979

The Agreed Order discussed during the June 15, 1979, meeting between representatives of ISBH and GDC was drafted and issued to Mr. Hagen's attorney, Mr. Cohen, by Mr. Karen. The letter noted that it was his intent to place the matter on the agenda of the SPCB for their December 18, 1979 meeting.

November 27, 1979

A letter was issued to Mr. Hagen approving the continued disposal of three hundred (300) tons per day of aluminum dross from U.S. Reduction at the GDC Landfill until June 15, 1980. The approval letter was conditioned on the following requirements:

1. The aluminum dross waste was to be disposed in a specially prepared disposal area, separate from the general refuse disposal area, and covered with a minimum of twelve (12) inches of soil at the end of the working day;
2. The generator and/or hauler must contact the GDC Landfill for disposal time notification purposes and conditions of shipment;
3. At least one (1) foot of compacted soil will separate refuse from all aluminum drosses;
4. The working face of the aluminum dross disposal area shall be kept to a minimum and any aluminum dross waste not covered with soil shall be misted with water to control fugitive dust; and
5. Progress reports will be submitted by U.S. Reduction Company and GDC to the Solid Waste Management Section before February 20, 1980, and again before May 24, 1980, explaining progress made to improve waste management and disposal practices.

December 18, 1979

An Agreed Order was issued to Mr. Hagen by ISBH. [Check this information and Cause No.; also, see June 15, 1979 entry.]

January 23, 1980

A letter was issued to Mr. Doyle from Mr. Jonathan T. McPhee, U.S. EPA Region V, regarding a conversation on January 17, 1980, discussing a draft Agreed Order, Cause No. B-406, for the GDC Landfill. Mr. McPhee provided his comments of the draft Agreed Order.

March 3, 1980

An inspection of the GDC Landfill was conducted by Mr. Oliver at 5:30pm. Mr. Oliver calculated a zero (0) total demerit score for the Landfill, noting that it was operating in an acceptable fashion. Mr. Oliver noted a brown colored water flowing into the depression adjacent to the Vulcan Materials property. Additionally, American Admixtures, noted Mr. Oliver, was utilizing this brown colored water and there was no need to pump into the Grand Calumet River. Lastly, Mr. Oliver observed that the clay wall is being constructed along the western boundary of

the site and the proposed leachate collection system was not being installed per the engineering drawings.

March 30, 1980

An inspection of the GDC Landfill was conducted by Mr. Oliver at 5:30pm. Mr. Oliver observed that a brown colored liquid was flowing into the depression adjacent to the Vulcan Materials facility. A total demerit score of zero (0) was calculated, an acceptable score.

May 13, 1980

A letter was issued to Mr. Hagen from Mr. Hert regarding the approval for disposal of fifteen thousand (15,000) cubic yards of fly ash from the Union Carbide, 4500 Kennedy Avenue, East Chicago, Indiana, at the GDC Landfill. Mr. McArdle of Industrial Disposal had made this particular request on March 25, 1980. The approval was conditioned on the following requirements:

1. The generator and/or hauler must contact the GDC Landfill to provide notification of the time of disposal and conditions of the shipment;
2. The fly ash shall not be placed in water; and
3. The fly ash shall not be used for daily or final cover.

May 14, 1980

A letter was issued to Mr. Hagen from Mr. Hert regarding the approval for disposal of asbestos material from the Amoco Oil Company ("Amoco"), Whiting, at the GDC Landfill. The letter approved forty (40) cubic yards per week for the first four (4) weeks, and twenty (20) cubic yards every other week thereafter. Mr. James Evenhouse of Calumet Waste Systems had made this particular request on April 16, 1980. The approval was conditioned on the following requirements:

1. The asbestos waste must be placed in bags which are sealed at the plant site;
2. The operator must wear a mask during the disposal of this material; and
3. The asbestos waste is to be mixed with refuse and covered with a minimum of six (6) inches of soil cover by the end of the working day.

May 20, 1980

The SPCB approved Agreed Order, Cause No. B-406, negotiated between GDC and ISBH. Among other requirements, the Agreed Order required GDC to submit an application for a modification of its original construction permit within one hundred and eighty (180) days of May 20, 1980. This Agreed Order specified that it would be a provisional operating permit for no greater than one (1) year from its effective date. Furthermore, the Agreed Order contained many operating conditions. [*Find this Agreed Order.*]

June 19, 1980

An inspection of the GDC Landfill was conducted by Mr. Oliver at 3:15pm. Mr. Oliver noted that blowing litter was a problem and calculated a total demerit score of three (3), an acceptable rating.

July 25, 1980

An inspection of the GDC Landfill was conducted by Mr. Oliver at 8:45am. Mr. Oliver observed that one (1) or two (2) loads of aluminum dross waste had been disposed at the GDC Landfill and required daily cover. A total demerit score of zero (0) was calculated, an acceptable rating.

August 25, 1980

A letter was issued to Mr. Hagen from Mr. Hert regarding the one-time approval for disposal of one hundred (100) cubic yards of asbestos material at the GDC Landfill. The asbestos material was removed from the Ken Industries property on North Sheffield Avenue by representatives from Amoco in Whiting, Indiana. Amoco had made this particular request on July 22, 1980. The approval was conditioned on the following requirements:

1. The generator and/or hauler must contact the GDC Landfill to provide notification of the time of disposal and conditions of the shipment;
2. Appropriate protective clothing should be used during handling and disposal to ensure proper protection from exposure to the material, especially contact with eyes, skin, and inhalation;
3. All asbestos must be sufficiently dampened to prevent airborne contamination during compaction;
4. The asbestos waste is to be mixed with refuse and covered with a minimum of six (6) inches of soil cover by the end of the working day; and
5. All the fire material and debris and any drums that may be located near asbestos material are to remain and are not to be considered as a part of the approval. [*It*

*appears that there may have been a fire at the Ken Industries property.
Determine the operations of Ken Industries.]*

September 19, 1980

An inspection of the GDC Landfill was conducted by Mr. Oliver at 11:30am. Mr. Oliver noted that daily cover had not been applied for two (2) or three (3) days. Additionally, Mr. Oliver noted that a "hot spot" was observed on the south bank near the Grand Calumet River. A total demerit score of five (5) was calculated, an unacceptable rating.

October 20, 1980

Mr. Cohen issued a letter to Mr. Tite regarding his lack of progress on developing a plan for the re-engineering and re-construction of the GDC Landfill pursuant to the Modified Construction Plan required under the Agreed Order issued in [April ?] 1980. Mr. Cohen noted Mr. Tite's procrastination and the expiration of Mr. Hagen's allotted time in which to complete and submit the Modified Construction Plan. Mr. Cohen requested a response by October 27, 1980.

October 30, 1980

A letter was issued to Mr. Hagen from Mr. Hert regarding the one-time approval for disposal of seven hundred (700) cubic yards of asbestos-contaminated material at the GDC Landfill. The asbestos material was removed from the Cities Services Refinery in Gary, Indiana. The Lloyd L. Hodges Company in Gary, Indiana had made this particular request on September 17, 1980. The approval was conditioned on the following requirements:

1. The generator and/or hauler must contact the GDC Landfill to provide notification of the time of disposal and conditions of the shipment;
2. All asbestos must be sufficiently dampened to prevent airborne contamination during compaction; and
3. The asbestos waste is to be mixed with refuse and covered with a minimum of six (6) inches of soil cover by the end of the working day.

November 14, 1980

GDC submitted its application for a modification of its original construction permit as required under the Agreed Order approved by the SPCB on May 20, 1980.

An inspection of the GDC Landfill was conducted by Mr. Oliver at 8:00am. Mr. Oliver noted that several areas did not have daily cover. Additionally, the aluminum dross waste, considered by Mr. Oliver to be a hazardous waste, was not being provided with a daily cover. Lastly, water and leachate were observed seeping into the GDC Landfill along the western boundary. A total demerit score of fourteen (14) was calculated, an unacceptable rating.

November 18, 1980

GDC submitted its Part A Hazardous Waste Permit Application ("Part A") to EPA Region V. Mr. Hagen signed the Part A on November 14, 1980. Section II.C notes that GDC is a facility which currently results in discharges to waters of the U.S.. Also, Section II.E is marked that GDC does or will treat, store, or dispose of hazardous wastes. Section XII, describing the nature of GDC's business, states that GDC engages in landfill disposal of general municipal, commercial, and industrial refuse, and other permitted industrial wastes.

Because GDC noted in Section II.E that it does or will treat, store, or dispose of hazardous wastes, it completed a Part A Form 3. Section II.A of Form 3 lists the initial construction or operation date of the GDC Landfill as July 1, 1973. Section III.B, requesting information on the process design capacity, lists the process code as D80 (landfill disposal) and the amount as one hundred (100) acre-feet. Section IV of Form 3 provided information regarding the hazardous wastes managed or to be managed at the GDC Landfill. The following EPA Hazardous Waste Codes were listed:

- F006 (wastewater treatment sludges from electroplating operations)
- K087 (coal tar decanter tank sludge)
- F005 (spent non-halogenated solvents: toluene, MEK, carbon disulfide, benzene, etc.)
- F003 (spent non-halogenated solvents: xylene, acetone, MIBK, methanol, etc.)

GDC listed 8.6, 2.0, 0.3, and 0.3 acre-feet, respectively, for the amounts of the above-listed hazardous wastes to be disposed at the GDC Landfill. *[This is peculiar as this should have been reported as pounds, tons, kilograms, or metric tons, not acre-feet. Section IV does not provide for an acre-feet measurement. Furthermore, Section IV notes that the GDC Landfill also accepted or planned to accept 0.2 and 6.1 acre-feet of two (2) other hazardous waste streams not associated with EPA Hazardous Waste Codes. The 0.2 acre-feet of hazardous waste was listed as co-disposal of calcium sulfate from IND 047 030 226, also known as U.S.S. Lead Refinery, Inc., located in East Chicago. The 6.1 acre-feet of hazardous waste was listed as co-disposal of terminal wastewater treatment sludge from IND 005 444 062, also known as U.S. Steel, Gary Works, located in Gary. This was accompanied by a notation that this would be a future hazardous waste stream for disposal and that it was currently stored at the manufacturer's plants.]*

The facility's geographic location is described as 41° 36' 55.3" North Latitude and 87° 25' 39.5" West Longitude in Section VII of Form 3. The facility drawing in Section V notes that the GDC Landfill occupies only a 208' x 208' section of the GDC site. A topographic map accompanying Form 3 identifies three (3) outfalls along the south border of the GDC facility and adjacent to the Grand Calumet River. The topographic map also identifies the 208' x 208' Landfill as the "hazardous waste management (HWM) location."

December 6, 1980

A letter was issued to Mr. Hagen from Mr. Hert regarding the approval for disposal of twenty-five (25) cubic yards per year of metal shavings from the Standard Steel Specialty Company at the GDC Landfill. Dombrosky & Holmes, Inc., 5051 South Western Boulevard, Chicago, Illinois, 60609, (312) 778-1400 ("D & H"), had made this particular request on October 28, 1980. The approval was conditioned on mixing the refuse with the metal shavings and covering it with a minimum of six (6) inches of daily cover.

December 17, 1980

A letter was issued to Mr. Hagen from Mr. Hert regarding the one-time approval for disposal of three hundred (300) cubic yards of asbestos-containing pipe insulation waste at the GDC Landfill. The asbestos waste was generated by the former Ashland Chemical Plant in Hammond, Indiana. Brandenburg Demolition, Inc. had made this particular request on November 7, 1980. The approval was conditioned on the following requirements:

1. The generator and/or hauler must contact the GDC Landfill to provide notification of the time of disposal and conditions of the shipment;
2. Appropriate protective clothing should be used during handling and disposal to ensure proper protection from exposure to the material, especially contact with eyes, skin, and inhalation;
3. All asbestos must be sufficiently dampened to prevent airborne contamination during compaction; and
4. The asbestos waste is to be mixed with refuse and covered with a minimum of six (6) inches of soil cover by the end of the working day.

January 8, 1981

An inspection of the GDC Landfill was conducted by Mr. Oliver at 5:00pm. Mr. Oliver noted that the solid waste was not being managed with a 3:1 slope. Additionally, a representative of the GDC Landfill stated that daily cover could not be applied for the solid waste that was

disposed on this date due to an equipment problem. A total demerit score of nine (9) was calculated, an unacceptable rating.

January 9, 1981

A letter was issued to Mr. Hagen from Mr. Hert regarding the one-time approval for disposal of fifty (50) cubic yards of asbestos waste at the GDC Landfill. The asbestos waste was generated by the Lever Brothers Company ("Lever Brothers"). Lever Brothers had made this particular request on December 15, 1980. The approval was conditioned on the following requirements:

1. The generator and/or hauler must contact the GDC Landfill to provide notification of the time of disposal and conditions of the shipment;
2. Appropriate protective clothing should be used during handling and disposal to ensure proper protection from exposure to the material, especially contact with eyes, skin, and inhalation;
3. All asbestos must be sufficiently dampened to prevent airborne contamination during compaction; and
4. The asbestos waste is to be mixed with refuse and covered with a minimum of six (6) inches of soil cover by the end of the working day.

January 14, 1981

A letter was issued to Mr. Hagen from Mr. Hert regarding the approval for disposal of eighty thousand (80,000) cubic yards of fly ash from the Union Carbide Corporation ("Union Carbide"), 4500 Kennedy Avenue, East Chicago, Indiana, at the GDC Landfill. Union Carbide had made this particular request on October 24, 1980. The approval was conditioned on the following requirements:

1. The generator and/or hauler must contact the GDC Landfill to provide notification of the time of disposal and conditions of the shipment;
2. The fly ash shall not be placed in water; and
3. The fly ash shall not be used for daily or final cover.

February 21, 1981

A letter was issued to Dr. Caldwell from Ms. Sandra S. Gardebring, Director, Enforcement Division, U.S. EPA Region V, regarding potential public health problems identified

during an inspection of the GDC Landfill by U.S. EPA Region V inspectors. Specifically, a night inspection revealed the presence of hundreds of thousands of rats at the GDC Landfill.

March 6, 1981

A letter was issued to Mr. Steve Wakefield, ISBH, from Mr. Sam Luri, Vice President, D & H, regarding a request to dispose of thirty-four (34) fifty-five (55) gallon drums and one (1) five (5) gallon container of paint waste from the Union Tank Car Company ("Union Tank"), located at 151st Street & Railroad Avenue in East Chicago, Indiana, at the GDC Landfill. Union Tank's EPA I.D. No. was listed as IND 005 456 058. D & H's EPA I.D. No. was listed as INT 190 019 877. In an attempt to gain approval, D & H provided the following information related to the request for disposal:

1. The waste stream was a "FO 17" [F017] hazardous waste;
2. The waste analysis was performed by Gabriel Laboratories; and
3. The contact for Union Tank was listed as Mr. Raymond Laudan and could be contacted at (312) 374-5250.

The approval request did include the statement, "approximately 2500 drums per year." It is not clear if this approval was ever granted by ISBH.

April 21, 1981

An inspection of the GDC Landfill was conducted by Mr. Oliver at 10:30am. Mr. Oliver observed that Union Carbide coal ash/slag was being accepted for disposal at the GDC Landfill. Mr. Oliver calculated a total demerit score of zero (0), an acceptable rating.

May 8, 1981

A letter was issued to Mr. Oliver from Mr. Hagen regarding a clarification on the status of the Gary Municipal Dump [*currently known as the Gary Landfill*]. Semantically, Mr. Hagen inquired as to whether the Gary Municipal Dump was actually a permitted landfill or whether it was an unpermitted dump. Mr. Hagen referenced a May 4, 1981 letter from Calumet Waste Systems arguing that it was not an unpermitted dump.

May 26, 1981

A letter was issued to Mr. Hagen from Mr. Dan B. Magoun, Supervisor, Conventional Waste Program, Solid Waste Management Section, Division of Sanitary Engineering, ISBH, regarding Mr. Hagen's May 8, 1981 inquiry. Mr. Magoun noted that the Gary Municipal Dump was not a permitted sanitary landfill pursuant to 330 IAC 4-1-1 (SPC 18), nor had it ever held a

permit. Furthermore, Mr. Magoun noted that the Gary Municipal Dump was evaluated by ISBH on September 19, 1980 and was found to have failed the criteria pertaining to disease vectors and fire hazards. Also, he noted that the SPCB had initiated a civil action in Lake County Circuit Court against the City of Gary for unacceptable operation of the site.

June 4, 1981

Mr. Hagen completed and signed a EPA Notification of Hazardous Waste Site Form, pursuant to section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") of 1980. In Section D, Mr. Hagen noted that waste disposal operations began in 1976 and continued to 1981, presumed to mean "the present." Mr. Hagen selected Option 2 in Section E. This option allowed Mr. Hagen, apparently familiar with characteristic and listed hazardous wastes under RCRA, to delineate those hazardous waste codes for hazardous wastes accepted at the GDC Landfill. Similar to the Part A filed by Mr. Hagen on November 18, 1980, he listed both F006 and K087 as hazardous waste streams handled by the GDC Landfill. In Section F, Mr. Hagen listed that his facility was a landfill and noted the estimated combined quantity of hazardous wastes at the site to be ninety-seven thousand six hundred and eighty (97,680) cubic yards over sixty-two (62) acres. Lastly, Mr. Hagen indicated that there were no known, suspected, or likely releases of wastes to the environment from the GDC Landfill.

June 9, 1981

Similar to Mr. Hagen of the GDC Landfill, Mr. Jeffrey Diver, counsel for Indiana Waste Systems, Inc. ("Indiana Waste"), P.O. Box 250, Valparaiso, Indiana, 46368, completed and signed a EPA Notification of Hazardous Waste Site Form, pursuant to Section 103 of CERCLA of 1980. Mr. Diver's phone number was listed as (312) 654-8800. *[It appears that EPA was attempting to gather Superfund-related information from suspected potentially-responsible parties, one of which being Indiana Waste, an alleged transporter of waste to the GDC Landfill. Additionally, it appears that Indiana Waste is/was a subsidiary of and Mr. Diver was an employee for Waste Management, Inc.]* Mr. Diver completed the above-noted form for Mr. W. Brand Bobosky, Assistant Secretary, Indiana Waste, 900 Jorie Boulevard, Oakbrook, Illinois, 60521. Indiana Waste listed the GDC Landfill as the site location under Section B. A notation by Mr. Diver stated that GDC asserts the GDC Landfill is under RCRA interim status. However, notes Mr. Diver, EPA Region V staff advised Indiana Waste that the GDC Landfill does not have interim status under RCRA although a Part A was filed. Option 1 of Section E was completed by Indiana Waste, as contrasted with Option 2 by Mr. Hagen. Under the heading, "General Type of Waste," Indiana Waste listed numerous wastes, including organics, inorganics, solvents, heavy metals, mixed municipal waste, unknown, incinerator residues, and oil sludge. Regarding the heading, "Source of Waste," Indiana Waste listed construction, fertilizer, iron/steel foundry, general chemical, utility companies, lab/hospital, unknown, and refineries. Section F, "Facility Type," notes both landfill and below ground drums. Specific information was not provided on such drums.

July 10, 1981

An inspection of the GDC Landfill was conducted by Mr. Oliver and Ms. Mary Janet Roe at 10:30am. They inquired as to the shredder material from the East Chicago Incinerator. Mr. Hagen stated that only recently had the shredder material been accepted for disposal at the GDC Landfill. Mr. Hagen stated that residue from the East Chicago Incinerator is not being accepted for disposal at the GDC Landfill. No demerit score was calculated as this was not a complete inspection.

August 20, 1981

Mr. Oliver inspected the GDC Landfill at 12:10pm. Mr. Oliver calculated a total demerit score of ten (10), an unacceptable rating. During the inspection, Mr. Oliver obtained Manifest Nos. 7302-12750 and 7302-12685 from Jones & Laughlin Steel Company that listed tar decanter sludge [*presumably a K087 listed hazardous waste*] and central waste treatment plant sludge, respectively. According to Mr. Oliver, both waste streams were received for disposal at the GDC Landfill on August 19, 1981. Mr. Oliver indicated that the central waste treatment plant sludge had not been provided with daily cover. Additionally, a clay wall was being constructed along the western boundary of the GDC Landfill. Lastly, the leachate collection system was not being constructed per the engineering drawings.

October 20, 1981

An inspection of the GDC Landfill was conducted by Messrs. Oliver and Bill Morgan at 10:15am. A total demerit score of zero (0) was calculated, an acceptable rating.

January 8, 1982

An inspection of the GDC Landfill was conducted by Messrs. Oliver and Stu Miller at 9:30am. He calculated a total demerit score of zero (0), an acceptable score. Messrs. Oliver and Miller observed foundry sand being utilized for daily cover.

February 10, 1982

A letter was issued to Mr. Lamm, Director, Division of Land Pollution Control, ISBH, from Mr. Thomas E. Ponicki, Director, Department of Public Works, Town of Munster, requesting the current status, including information related to environmental violations, of the GDC Landfill.

February 16, 1982

Two (2) letters were issued to Mr. Hagen by the Indiana Environmental Management Board ("EMB"). [*The EMB had replaced the SPCB as the entity responsible for landfill*]

permits.] The first letter approved the amended construction plans, submitted on November 14 and received on November 17, 1980, for Construction Plan Permit No. SW-133. The GDC Landfill was previously issued a construction plan permit on June 21, 1973.

The second letter renewed GDC's Operating Permit No. 45-2, with both approval letters subject to nine (9) conditions, including:

1. That sandy, granular material under the Unified Soil Classification of SW and SP not be used for daily cover;
2. That the clay perimeter seal be compacted to 90% Standard Proctor density;
3. That results of compaction tests conducted on the perimeter seal be submitted to the Division of Land Pollution Control staff within 15 days of completion of the tests;
4. That after each section of leachate collection pipe is installed, it be inspected by a Division of Land Pollution Control staff member before it is covered; and
5. That the discharge of water from the site to the Grand Calumet River or other waters of the State of Indiana shall not occur except in conformity with an approved NPDES permit.

According to the Operating Permit No. 45-2 renewal certificate, the permit renewal would expire on March 1, 1984. *[Apparently, there is a second letter, but it is nowhere to be found. The February 16, 1982 letter only lists five (5) conditions, not nine (9). Need to check with EPA for the second page which is assumed to be missing. Allegedly, there is also a requirement for the quarterly sampling of the GDC Landfill monitoring wells and for the termination of hazardous waste disposal, as defined in 330 IAC 4-2-1, within sixty (60) days.]*

March 11, 1982

A letter was issued by Mr. Terry K. Hiestand, Mr. Hagen's attorney, to the EMB requesting a hearing pursuant to IC 13-7-10-5(b). Mr. Hiestand appealed the conditions approved in both letters issued by the EMB on February 16, 1982.

March 23, 1982

A letter was issued to ISBH from Mr. King D. Killin, Vice President, Engineering Department, U.S. Reduction Company, 2025 175th Street, Lansing, Illinois, 60438, requesting the groundwater analyses from the GDC Landfill monitoring wells and surface water discharge analyses for 1979, 1980, and 1981.

April 21, 1982

A letter was issued to Mr. Ponicki from Mr. William L. Morgan, Chief, Facility Inspection Section, Solid Waste Management Branch, Division of Land Pollution Control, ISBH, noting the GDC Landfill had been issued two (2) letters recently, including a letter amending the Construction Plan Permit No. SW-133 and a letter renewing GDC's operating permit No. 45-2. Mr. Morgan stated that Mr. Hagen had appealed portions of both letters in accordance with IC 13-7-10-4(a) and IC 13-7-10-5(b).

June 1, 1982

A letter was issued to Mr. Richard Shandross, State Implementation Officer, U.S. EPA Region V, from Mr. Palin, Acting Chief, Engineering Section, Technical Support Branch, Division of Land Pollution Control, ISBH, requesting documentation on the status of GDC's interim status permit. Mr. Hagen, noted Mr. Palin, contended that he had filed all the necessary papers in a timely fashion, and that since he had an EPA I.D. No., he must have interim status to accept hazardous waste.

June 10, 1982

A letter was issued to Mr. Palin from Mr. Shandross regarding the regulated status of the GDC Landfill under RCRA. According to Mr. Shandross, GDC had only complied with two (2) of the three (3) prerequisites for obtaining interim status, including the current ownership and operation of an existing hazardous waste management facility as defined at 40 CFR 260.20 and the submission of a Part A before November 19, 1980. However, GDC failed to submit a Notification of Hazardous Waste Activity Form ("Notification Form") to EPA by August 18, 1980. Although the Part A or the Notification Form provides an EPA I.D. No. for a facility, the fact that a facility retains an EPA I.D. No. does not provide proof that a facility has complied with all three (3) prerequisites for obtaining interim status. More specifically, Mr. Shandross noted that Mr. Hagen telephoned U.S. EPA Region V on September 11, 1980 to state that he had never received his Notification Form. Even if Mr. Hagen had filed a Notification Form for the GDC Landfill, according to Mr. Shandross, it would not have been filed in a timely manner and, therefore, interim status should be precluded.

July 7, 1982

A letter was issued to Mr. Hagen from Mr. Andrew F. Livovich, Chemist, Lake County Health Department regarding three (3) water samples obtained from the GDC Landfill as delivered on July 1, 1982. *[Have Rose create a table for inclusion into this document.]*

July 19, 1982

Mr. Copeland Bernauer, ISBH, obtained samples from three (3) wells at the GDC Landfill. Mr. Bernauer noted that there were no caps on the west, south, and north well casings. Additionally, ponding was observed around the west and south casings. Mr. Bernauer noted that the north well was dry. The three (3) samples were delivered to the lab on July 22, 1982 at 8:30am.

July 30, 1982

A letter was issued to the ISBH from Dr. A. William Douglas, Director, Gary Municipal Airport Authority District, regarding the significant bird hazard presented by the GDC Landfill. Also of concern was the increase in vertical elevation of the GDC Landfill. Although no airspace violations were identified, Mr. Douglas promised to keep the ISBH informed.

August 10, 1982

An inspection of the GDC Landfill was conducted by Messrs. Oliver and Miller at 5:00pm. They calculated a total demerit score of nine (9) for the GDC Landfill, an unacceptable rating. Messrs. Oliver and Miller observed leachate on-site as water was flowing through the sides of the GDC Landfill and through the refuse and into a new trench being constructed. Also, they observed shredder fluff being utilized as for daily cover. The new trench being constructed was noted as being constructed too close to the present working area, thus exposing refuse and aluminum dross. According to notes made on the inspection report by Mr. Hagen, the exposed refuse was a result of a (clay) wall collapsing due to heavy rains.

August 25, 1982

Mr. Kyle delivered a Petitioner's First Set of Interrogatories, Requests for Admissions, and Requests for the Production of Documents to Mr. Scherschel for Cause No. N-53.

September 28, 1982

Messrs. Palin, Miller, Oliver, Matthew Scherschel, Ms. Karyl Schmidt met with Messrs. Hagen, Vic Indiano, and John Kyle at the GDC Landfill to discuss the pending legal action by the ISBH. The following observations were made:

1. leachate from the GDC Landfill was being discharged from the American Admixtures Fly Ash Processing Facility ("American Admixtures") into a ditch along the railroad on the eastern boundary of the site;
2. the leachate from the ditch was flowing into the borrow pit in and around the sump pump (Mr. Hagen stated he had attempted to seal the wall on several occasions with little success);

3. Mr. Hagen's description to Mr. Palin of the berm constructed along the western boundary indicated that it was not as wide as prescribed within the construction plan; and
4. the odorous black and red water was leaking into the borrow pit from several locations with the largest problem observed at the northwest corner of the site.

October 2, 1982

Two thousand seven hundred and fifty (2,750) gallons of F005 (spent non-halogenated solvents) hazardous paint sludge waste were manifested (Manifest No. 00134) from American Chemical Services, Inc. ("ACS"), 420 South Colfax Avenue, Griffith, Indiana (EPA I.D. No. IND 01630265X), transported by Independent Waste System ("Independent"), P.O. Box 269, Griffith, Indiana (EPA I.D. No. IND 051942563), and accepted by Mr. Brian Boyd for disposal at the GDC Landfill on October 2, 1982. [*The GDC Landfill was mistakenly listed as Transporter No. 2 on this manifest.*]

October 12, 1982

A Notice of Taking Deposition and Proof of Service was served on Messrs. Palin and Oliver for a deposition to occur on October 14, 1982 at 9:00am.

October 15, 1982

Two thousand seven hundred and fifty (2,750) gallons of F005 (spent non-halogenated solvents) hazardous paint sludge waste were manifested (Manifest No. 00135) from ACS, transported by Independent, and accepted by Mr. Brian Boyd for disposal at the GDC Landfill on October 15, 1982.

October 29, 1982

Two thousand seven hundred and fifty (2,750) gallons of F005 (spent non-halogenated solvents) hazardous paint sludge waste were manifested (Manifest No. 00136) from ACS, transported by Independent, and accepted by Mr. Brian Boyd for disposal at the GDC Landfill on October XX, 1982.

Four (4) water samples were obtained from the GDC Landfill wells and sent to the Lake County Health Department for analysis.

November 3, 1982

A letter was issued to Mr. Hagen from Mr. Andrew F. Livovich, Chemist, Lake County Health Department regarding four (4) water samples obtained from the GDC Landfill as delivered on November 1, 1982. [*Have Rose create a table for inclusion into this document.*]

November 22, 1982

A letter was issued to Mr. Chuck Epstein, Jones & Laughlin Steel Corporation, 3001 Dickey Road, East Chicago, Indiana, 46312, from Mr. Oliver regarding the following pieces of information on their central treatment plant sludge, terminal treatment plant sludge, No. 6 stand oil (bottom sludge and oil), and coke tar decanter sludge:

1. volume of each waste liquid or sludge which was shipped for land disposal on a monthly basis since January 1981;
2. who transported said waste for disposal; and
3. identify the disposal site if it is other than the GDC Landfill. Please identify any other liquids or sludges that you dispose of at the above Landfill.

November 29, 1982

One (1) twenty (20) cubic yard roll-off box of hazardous rubber battery chip waste was manifested (Disposal Service Copy No. 8614) by Mr. John Valocik from U.S.S. Lead Refinery, Inc. ("U.S.S. Lead"), 5300 Kennedy Avenue, East Chicago, Indiana, 46312 (EPA I.D. No. IND 047030226), transported by Industrial Disposal Corporation ("Industrial Disposal"), 2000 Gary Avenue, P.O. Box 59, East Chicago, Indiana, 46312 (EPA I.D. No. IND 044250587), and accepted by Mr. Brian Boyd for disposal at the GDC Landfill on November 29, 1982.

November 30, 1982

A letter was issued to Mr. Scherschel from Mr. Kyle regarding a draft Agreed Order [*determine which Agreed Order*] and answers to the first set of interrogatories. Mr. Kyle stated that a significant issue surrounded the approval for disposal of steel mill sludges from Jones & Laughlin Steel Company.

December 3, 1982

An inspection of the GDC Landfill was conducted by Messrs. Oliver and Miller at 9:10am. A total demerit score of zero (0) was calculated, an acceptable rating.

December 17, 1982

A letter was issued to Mr. Hagen from Mr. Guinn Doyle, Chief, Hazardous Waste Management Branch, Division of Land Pollution Control, ISBH, regarding the regulatory requirements of managing run-off (40 CFR 265.302(b)) from the portion(s) of the GDC Landfill that are active and not closed in accordance with a RCRA closure plan. Mr. Doyle also stressed the importance of performing a hazardous waste determination, pursuant to 40 CFR 262.11, for the collected run-off. If the collected run-off is determined to be a hazardous waste and is discharged through a point source to waters of the United States, then it is subject to Section 402 of the Clean Water Act.

December 28, 1982

An inspection of the GDC Landfill was conducted by Mr. Miller at 10:45am. A total demerit score of zero (0) was calculated, an acceptable rating.

February 10, 1983

An inspection of the GDC Landfill was conducted by Mr. Miller at 8:30am. Mr. Miller calculated a total demerit score of zero (0) for the GDC Landfill, an acceptable rating. Mr. Miller observed that daily cover was being applied and clay was being placed on older disposal areas where leachate was formerly seeping out of the GDC Landfill.

February 18, 1983

The EMB approved Agreed Order, Cause No. N-53, as negotiated between GDC and ISBH. Agreed Order, Cause No. N-53 settled the appeal filed by GDC contesting the imposition of nine (9) conditions placed upon the GDC Landfill by the EMB on February 16, 1982, in renewing Operating Permit No. 45-2. The text of Agreed Order, Cause No. N-53 is below:

**SETTLEMENT AGREEMENT AND
RECOMMENDED AGREED ORDER**

Comes now Petitioner, Gary Development, Inc., by counsel and by Larry Hagen, Vice President and General Manager; and comes now Respondent, the Indiana Environmental Management Board ("EMB"), by Linley Pearson, Attorney General, by Matthew Scherschel, Deputy Attorney General. The parties show the Hearing Officer that they have resolved their differences and ask the Hearing Officer to recommend an order to EMB in accordance with the terms and conditions set forth in Part II below.

I. HISTORY AND BACKGROUND

In early 1973, Petitioner began to explore developing a sanitary landfill in a mined-out, water-filled, sand pit in Gary, Indiana (hereinafter called the "site"). On May 15, 1973, the Indiana Stream Pollution Control Board ("SPCB") approved Petitioner's proposal to dewater the

sand pit. On June 19, 1973, SPCB granted Petitioner Construction Permit SW133, thereby allowing preparatory construction work for a sanitary landfill to begin.

On August 29, 1974, the State conducted its final inspection of the site which led to SPCB's granting final approval to Petitioner to commence sanitary landfill operations. The landfill began accepting solid waste for disposal in September 1974. On February 20, 1975, SPCB sent Petitioner its Operating Permit No. 45-2.

On May 20, 1980, SPCB approved an Agreed Order negotiated between Petitioner and SPCB staff. This Order required that Petitioner submit within one-hundred and eighty (180) days of May 20, 1980, an application for a modification of its original construction permit. This application was timely submitted to SPCB on November 14, 1980.

On February 16, 1982, the Indiana Environmental Management Board ("EMB": in the interim, EMB replaced SPCB as the Indiana agency responsible for landfill permits) notified Petitioner by two (2) nearly identical letters (hereafter called the "February 16, 1982 letter"), indicating that its Operating Permit No. 45-2 had been renewed and that its revised construction plans submitted November 14, 1980, had been approved, both subject to nine (9) conditions. Petitioner thereafter filed a petition for hearing, contesting the imposition of these nine (9) conditions.

Since that time the parties have negotiated the agreement set forth in Part II below, resolving the issues in dispute. The parties request that the Hearing Officer recommend that EMB enter the provisions of Part II below as an Agreed Order in Cause No. N-53.

II. RECOMMENDED AGREED ORDER

It is expressly agreed and understood that the provisions of this Recommended Agreed Order constitute a modification of Petitioner's modified Construction Permit No. SW-133 and Operating Permit No. 45-2. To the extent that this Recommended Agreed Order is inconsistent with these two permits; the drawings and narrative submitted on November 14, 1980; or the State's February 16, 1982 letter, the provisions below shall supersede such inconsistent provisions, and shall govern construction and operations at the site from the date this Recommended Agreed Order is approved by EMB. (This date is hereafter called "the effective date of this Order.")

1. Condition No. 1 in the February 16, 1982 letter, to wit: Sandy, granular material under the unified soil classification SW and SP will not be used for daily cover at the site, remains unchanged.
2. Condition No. 4 in the February 16, 1982 letter, is deleted and replaced by the following:

Petitioner shall notify a staff member of the Indiana Division of Land Pollution Control (hereafter called "staff") by phone at least seven (7) days in advance of the installation of any required leachate collection system on-site, to allow staff to inspect such installation.

- a. After such notification, Petitioner may install the system on the appointed day at the appointed hour, or as soon thereafter as weather permits, whether or not staff is present.
 - b. If staff is not present for such installation, Petitioner shall document with photographs and narrative that the installation complies with Petitioner's amended construction permit.
 - c. Any required leachate collection system shall be installed in compliance with the amended construction permit.
3. Condition No. 3 in the February 16, 1982 letter, regarding the discharge of water from the site into the Grand Calumet River or other waters of the State of Indiana is deleted in its entirety.
 4. Condition No. 6 in the February 16, 1982 letter, is deleted and replaced by the following:

It is not necessary that Petitioner to install the seepage collection pond detailed on page seven (7) of Petitioner's Engineering Plan. Petitioner agrees that no solid waste will be deposited in "standing water;" the phrase "standing water" shall not be construed to mean de minimis amounts of water or small rain-filled puddles.

5. Condition No. 7 in the February 16, 1982 letter, is deleted and replaced by the following:

The Clay Perimeter Seal along the south side of the site shall be constructed to an elevation of 589.7 MSL and shall be at least ten (10) feet wide. The parties expressly agree that the portion of Petitioner's landfill located at the southeastern portion of the site which is completed and at final grade as of December 14, 1982, will not be affected by this requirement.

6. Condition No. 8 in the February 16, 1982 letter, is deleted and replaced by the following:

The four (4) on-site monitoring wells will be sampled on a quarterly basis. The sampling months are January, April, July and October, with samples to be taken at the end of each month and analyzed.

- a. Results of these tests shall be submitted to staff by the end of the following month. The parameters to be tested are chloride, chemical oxygen demand, total hardness, total iron, and total dissolved solids.

7. The modified construction plans approved February 16, 1982, called for compaction of the clay perimeter wall around the site and testing the clay used for constructing this wall in accordance with the 90% Standard Proctor Density Test. Petitioner has found it technically and economically impractical to utilize this test. Respondent has agreed to substitute for this test any test acceptable to staff which will accurately portray the permeability of the clay perimeter wall. Accordingly, Conditions 2 and 3 of the February 16, 1982 letter, are deleted and replaced with the following:

- a. Within forty-five (45) days of the effective date of this Order, or if weather conditions prevent taking the borings within this time period, as soon thereafter as weather permits, Petitioner will have four soil borings (which may be drilled at an angle) taken from the site's west wall, at random locations along the wall, with split spoon samples taken at five-foot depth intervals in each boring. Blowcounts will be recorded for each split spoon sample taken. The soil boring team will visually inspect the split spoon samples taken from each hole drilled and keep a log of their observations to include any identifiable irregularities or voids encountered during drilling. A total of five (5) Shelby tube samples shall be taken from the borings. The Shelby tube samples will be subjected to a hydraulic conductivity test to ascertain the samples' permeability. Test results will be forwarded to staff within fifteen (15) days of their receipt by Petitioner. Staff shall be notified at least seven (7) days in advance of any such boring, and will be given an opportunity to attend and view the drilling. Staff shall not interfere with such operations.
- b. If the test results show the permeability of the clay wall to be 5.0×10^{-6} centimeters per second or less (i.e. 4.9×10^{-6} , 4.0×10^{-6} , 3.0×10^{-6} , 2.0×10^{-6} , 1.0×10^{-6} , 1.0×10^{-7} , 1.0×10^{-8} , etc.), then no remedial action for the west clay perimeter wall will be required unless staff identifies a significant infiltration of liquid as discussed in subparagraph 7c.
- c. If the test results show that the permeability of the west perimeter wall is 5.1×10^{-6} centimeters per second or greater (i.e. 5.1×10^{-6} , 6.0×10^{-6} , 7.0×10^{-6} , 8.0×10^{-6} , 9.0×10^{-6} , 1.0×10^{-5} , 1.0×10^{-4} , etc.); or if staff identifies a

significant infiltration problem involving a concentrated flow of liquid into the site through the west wall or emanating from an area of deposited solid waste along that wall, then it is agreed that further negotiations between the parties will be required to determine what remedial action, if any, must be undertaken along the west wall. If the parties are unable to reach an agreement as to such remedial measures, if any, within sixty (60) days of (i) the submission of the test results to the State, or (ii) the date a significant infiltration of liquid, staff notifies Petitioner in writing of a finding of the issue of what remedial action may be required shall be submitted to the Hearing Officer for hearing and decision.

d. Until the soil boring tests are completed with satisfactory results in accordance with subparagraphs "a" and "b" above; or until an agreement is approved, or order entered pursuant to subparagraph "c" above, Petitioner agrees not to construct any further portions of the clay perimeter wall around the site.

i. If said test results are satisfactory in accordance with subparagraphs 7b, and no significant infiltration of liquid is identified in accordance with subparagraph 7c, then construction of the remaining portions of the clay perimeter wall shall proceed in the same manner as the construction of the west wall so as to ensure a permeability factor at least equivalent to the test results for the west wall and to ensure that infiltration of liquid into the site through these newly constructed walls does not occur. In this event, Petitioner will submit narrative to staff describing the method used to construct the west wall and will document the construction of the remaining portions of the clay perimeter wall with pictures and narrative to ensure consistent construction practices.

ii. If said test results are unsatisfactory, or a significant infiltration of liquid is identified in accordance with subparagraph 7c, the parties will attempt to negotiate an acceptable alternative for the construction of the remaining portions of the clay perimeter wall, or failing on agreement, submit the matter to the Hearing Officer for hearing and decision.

8. Condition 9 of the February 16, 1982 letter, is deleted and replaced by the following:

a. Petitioner's landfill will not be excluded from consideration as, and will be considered, one of the several sanitary landfills in Indiana which are,

satisfactory repositories for special or "hazardous waste" as defined in 329 IAC 5-2-1(19) (1982 Cum. Supp.) (hereafter called "special waste"). The parties specifically agree that no "hazardous waste" as defined and identified in 320 IAC 4-3 (1982 Cum. Supp.) (hereafter called "RCRA hazardous waste") shall be deposited at Petitioner's landfill after the effective date of this Order.

- b. Petitioner shall be permitted to continue receiving the following "special wastes" from the effective date of this Order until further action of the Board or Staff:
 - i. U.S. Reduction Dust;
 - ii. Asbestos fill from Borg-Warner and Amoco Oil (which wastestreams were subject to Special Permission letters dated May 17, 1977, and May 14, 1980, respectively);
 - iii. Corn starch and carbon filters from American Maize Products Company (which wastestreams were subject to a Special Permission letter dated February 20, 1976);
 - iv. The following steel mill sludges from J & L Steel Corporation: the Central Treatment Plant Sludge, the Terminal Treatment Plant Sludge, and the Sludge from the 6 Stand Oil Recovery Unit.
- c. After the effective date of this Order, staff will send a letter to the generators of the special wastes listed in subparagraph b above, requesting that the generators submit further information regarding the nature of the wastestreams identified in subparagraph 8b above, to staff within sixty (60) days of receipt of such letter; it is expressly agreed that this 60-day period will be extended by staff for good cause shown. Staff will analyze such updated information, make a final determination whether these listed special wastes may continue to be disposed of at the site, and shall promptly notify the generator of the waste and Petitioner of its decision. Any such decision shall constitute a "final decision." Any such decision shall constitute a "final action" for which Petitioner may file a Petition for hearing before the Board pursuant to IC 4-22-1 (1982) and IC 13-7-11-3 (1982). Any special permission letters issued for these listed wastes shall last one year. Renewal of such letters will be granted if the materials do not change significantly in quality of quantity, and if Petitioner's operation of the site is in compliance with this Agreed Order, and Petitioner's modified construction permit and operating permit.

- d. It is the parties' intention that other "special waste" of similar quality, quantity and composition as; and other "special waste" presenting similar environmental hazards as, the above-listed special wastes will be considered for disposal at the site. The decision whether to allow "special waste" in addition to those listed above to be deposited at Petitioner's site, must be made by staff on a case-by-case basis after considering the physical and chemical composition of the proposed waste as well as current operations at the site. Although it is impossible to make any guarantees in advance, staff agrees in principle that, given satisfactory operations and construction at the site in compliance with this Order; Operating Permit 45-2; and the modified construction plans approved February 16, 1982, wastestreams with similar chemical and physical composition, and wastestreams presenting similar environmental hazards as the special wastes listed in subparagraph "b" above, will be considered suitable for disposal at the site.
 - e. The parties Agree that materials such as debris, wood, construction refuse, steel, etc.; "coal ash," including fly ash and bottom ash (i.e., the resultant "ash" from coal burning); may be disposed of at the site without any special permission letters.
 - f. Petitioner agrees to submit a quarterly report to staff setting forth the types and amounts of "special wastes" disposed of at the site. These reports will be due the same day for the same period as the monitoring well reports referred to in paragraph 6 above.
 - g. Finally, the parties agree to cooperate in good faith in exploring the possibility of depositing the Georgia Pacific paper sludge and municipal treatment plant sludges at the site.
9. The parties agree that Petitioner's Operating Permit and amended Construction Permit shall last for a period of two years from the effective date of this Agreed Order. The renewal of this Operating Permit and amended Construction Permit, or the decision of whether or grant or renew special permission letters referred to in paragraph 8b, 8c and 8d above, shall be based upon Petitioner's compliance with this Agreed Order, Petitioner's modified construction permit and operating permit and IC 13-7. For the purpose of renewals of existing special permission letters (subparagraph 8c), granting and renewal of additional special permission letter (subparagraph 8d), and the renewal of Petitioner's Operating Permit and amended Construction Permit (paragraph 9), the phrase "compliance with this Agreed Order, Petitioner's modified construction permit and operating permit" shall include but not be limited to (1) any de minimus or insignificant variations from the Agreed Order and/or Petitioner's modified construction permit and

operating permit, and/or (2) any inspection report which contains demerits, but which still shows an "acceptable" rating, and/or (3) any unacceptable rating on 40 percent or less of the inspection reports conducted by the State in any 12-month period.

March 1, 1983

An Agreed Order, Cause No. N-53, was issued to GDC by the ISBH that had approved by the EMB. This Agreed Order resolved the appeal filed by GDC regarding the nine (9) conditions placed upon GDC through the approval on February 16, 1982 of both its operating permit renewal and amended construction plan.

April 6, 1983

Mr. Miller inspected the GDC Landfill at 10:30am. Mr. Miller calculated a total demerit score of nine (9), an unacceptable rating. During the inspection, he noted that general refuse had accumulated within standing water at the GDC Landfill.

June 29, 1983

A Potential Hazardous Waste Site Preliminary Assessment (TDD No. R5-8212-02A-085) was completed by Ms. Kathy McCormack and Messrs. Claude Mays and Mark Lunsford of Ecology & Environment, Inc. for the GDC Landfill.

July 5, 1983

On July 5, 1983, the Gary area was subject to a rain event that produced seven (7) inches of rain in a two (2) hour period. As a result, the Grand Calumet River rose above the one hundred (100) year flood stage, thus flooding the GDC Landfill. Mr. Hagen estimated that approximately one hundred million (100,000,000) gallons of water infiltrated the GDC Landfill. He also noted that he had lost two (2) cranes and many pumps.

July 11, 1983

Mr. Miller inspected the GDC Landfill at 12:30pm. Mr. Miller observed two (2) loads of hot lime from Blaw Knox that had been accepted for disposal at the GDC Landfill. In particular, the loads caused a fire on the GDC Landfill. A third load was rejected for disposal. Mr. Miller rated the GDC Landfill as acceptable.

August 25, 1983

An inspection of the GDC Landfill was performed by Mr. Miller at 1:30pm. He noted that the site was in an unacceptable condition as the water from the July 4, 1983 rain event had

not been pumped out by Mr. Hagen. Furthermore, the active disposal area failed to retain adequate daily cover with foundry sand from Blaw Knox being utilized for such purposes. GDC was accepting J & L iron ore dust and slag for use as a road base. Mr. Miller rated the GDC Landfill as unacceptable.

September 7, 1983

A letter was issued to Mr. Anthony Gentile, American Resources Corporation ("American Resources"), P.O. Box 813, Valley Forge, Pennsylvania, 19482, from Mr. Palin regarding the approval of the concept of a solidification process at the American Admixtures facility. Specifically, American Resources, through a August 12, 1983 letter, proposed to solidify industrial liquid waste [*it is unclear if this would include hazardous waste*] with fly ash at the American Admixtures facility located on property occupied by the GDC Landfill. The industrial liquid wastes to be mixed with fly ash, according to Mr. Palin, will need to receive a case-by-case approval by the ISBH. Mr. Palin noted that the maximum amount of liquid industrial waste needed should be one million (1,000,000) gallons. Mr. Palin specified that he approved of the concept only, and not of the actual solidification process itself. Once American Resources has identified liquid industrial wastes for solidification with fly ash, then they must gain the approval of the Technical Secretary of the Environmental Management Board.

September 14, 1983

Messrs. Miller and Roy E. Harbert inspected the Blaw Know Foundry ("Blaw Knox") in East Chicago, Indiana with Mr. William Kepka. According to Mr. Harbert, the sand, slag, and baghouse dust wastes were being disposed at the GDC Landfill. The baghouse dusts from the Blaw Knox electric arc furnace were high in cadmium. [*Mr. Harbert does not state whether Mr. Kepka performed a proper waste determination (EP Toxicity) for the electric arc furnace dust, a potential D006 hazardous waste.*] Mr. Kepka stated that Blaw Knox's corporate attorney advised him to mix the electric arc furnace dust with sand and slag waste. Mr. Harbert told Mr. Kepka that this mixing was considered illegal treatment and a permit would be necessary. Furthermore, Mr. Harbert suggested that a new EP Toxicity test be performed on the electric arc furnace dust so that a proper disposal facility could be selected.

September 27, 1983

A letter was issued to Ms. Karyl K. Schmidt, Chief, Geology/Chemistry Support Section, Land Pollution Control Division, ISBH from Mr. Kyle regarding his conversation with Mr. Michael Burns, U.S. EPA, advising that GDC did not need to fully complete the EPA general questionnaire on TSD facilities. A January 24, 1983 cover letter from GDC to EPA explained that the various hazardous waste streams accepted by the GDC Landfill in 1981 were *de minimus* amount and nature.

October 13, 1983

An inspection of the GDC Landfill was performed by Mr. Miller at 2:45pm. He noted that the site was in an unacceptable condition. The water observed during the August 25, 1983 inspection had not been pumped off-site, although some progress was made, according to Mr. Miller. Mr. Miller again noted that GDC was utilizing foundry sand as daily cover.

November 9, 1983

A letter was issued to GDC from ISBH requesting a clarification as to their regulatory status. *[Find this letter.]*

December 27 & 28, 1983

A inspection of the GDC Landfill was performed by Ecology & Environment, Inc. for U.S. EPA Region V in an effort to complete a Potential Hazardous Waste Site Inspection Report. Samples were obtained from the monitoring wells by Messrs. Paul Hess, John Angelo, Dan Cozza, and Ms. Anne Sause.

December 30, 1983

A memorandum was issued by Ms. Sause regarding the December 28, 1983 sampling event. Ms. Sause noted that samples were obtained from two (2) monitoring wells on the south portion of the property and a ditch along the west property line.

January 3, 1984

The EMB revoked four (4) previously approved special waste disposal permits. The four (4) permits revoked included the Borg-Warner asbestos, the Amoco Oil Company asbestos, the U.S. Reduction milling dust and slag, and the J & L sludge waste. Apparently, the EMB revoked the four (4) permits because of continuing violations of Agreed Order, Cause No. N-53. *[Determine the four (4) special wastes and when they were originally approved.]*

January 5, 1984

Messrs. Oliver, Palin, Scherschel and Miller met with Messrs. Hagen and Kyle to discuss the GDC Landfill. They discussed the July 4 rain event and subsequent GDC Landfill inspections on August 25 and October 13, 1983. Mr. Hagen noted that he had purchased a crane in Louisville, Kentucky for one hundred and thirty seven thousand (\$137,000) dollars. Apparently, the bolts on the crane were cut and Mr. Hagen was required to expend an additional amount of funds to obtain new parts. According to Mr. Hagen, the crane was operational by the end of August, 1983. The parties also discussed the soil borings that were required on the west wall of the GDC Landfill as specified by the Consent Decree *[find out which one this is (N-53?)]*. Standing water was observed in this area, thus making it too wet to perform soil borings. GDC

suggested that Vulcan Materials was the cause of the water problem. Furthermore, GDC stated that, due to the manner in which the wall was constructed, the borings won't tell ISBH anything. The third issue discussed surrounded the special waste revocations issued recently by ISBH to GDC. GDC did not believe that ISBH had just cause to revoke the approvals and, furthermore, it would bankrupt the GDC Landfill. Lastly, the parties also discussed the Samocki Hole and GDC noted that this was where waste from J & L Steel was being deposited. *[Determine if the Samocki Hole is a particular unit within the GDC Landfill itself. Furthermore, determine the nature and specific origin of the J & L Steel waste as it may have been a RCRA hazardous waste stream.]*

January 16, 1984

An inspection of the GDC Landfill was conducted by Mr. Miller at 11:30am. Mr. Miller observed that clay was being excavated and that it appears that clay cover is being provided daily. Mr. Miller rated the GDC Landfill as acceptable.

January 23, 1984

GDC appealed the January 3, 1984 revocation of its four (4) special waste disposal permits.

January 24, 1984

A file memorandum was completed by Mr. Hess discussing the attached inspection report completed by Ecology & Environment, Inc. for the December 27 & 28, 1983 inspection of the GDC Landfill. Of particular interest, the memorandum stated:

"The possibility that hazardous waste deposited at this site might migrate off site via the natural groundwater flow is remote. However, once the facility is closed and the on-site water table is allowed to recover from this negative influence, the question of hazardous waste migration via the groundwater route will have to be reassessed. Therefore, the adequacy of the site's clay liner will have to be evaluated before the site is closed.

The source or sources of any contaminated groundwater found at or near this site becomes a complex problem because there are twelve (12) alleged or known hazardous waste sites within a two (2) mile radius. Five (5) of these sites border the perimeter of this landfill."

January 26, 1984

A letter was issued to the Deputy Attorney General from ISBH regarding the closure requirements necessary of the GDC Landfill. Also the letter noted that GDC must amend the construction plan permit to avoid closure before reaching approved final contours. *[Find this letter.]*

February 8, 1984

A letter was issued to Mr. Kyle from Mr. Karl J. Klepitsch, Jr., Chief, Waste Management Branch, U.S. EPA Region V, regarding Mr. Kyle's October 7, 1983 request to remove the GDC Landfill from RCRA Subtitle C regulation. Mr. Klepitsch stated that the GDC Landfill was required to have a RCRA permit and could not be withdrawn from the system noting, "*RCRA regulations do not provide for waivers of closure or post-closure requirements based upon the quantity of wastes handled.*" Mr. Klepitsch noted that a recent inspection of ACS revealed that thirty-three (33) shipments of F005 hazardous waste were manifested to the GDC Landfill in 1981 and, furthermore, several other shipments of F005 hazardous waste occurred between November 19, 1980 and early 1981. Also, he asserted that classifying paint waste as merely F005 hazardous waste might be incorrect due to heavy metal contamination. Lastly, EPA learned that the ACS wastes were not always mixed with sand to eliminate the characteristic of ignitability. Apparently, such mixing did not begin until late 1981 or early 1982. The letter closes by stating, "*...it is not in the public interest for Gary Development Landfill to be issued an Interim Status Compliance Letter for continued hazardous waste operation.*"

February 29, 1984

A memorandum from Ms. Cynthia Bachunas of Ecology & Environment, Inc. to Mr. Hess noted that the review of the sampling data from the December 27 & 28, 1983 GDC Landfill sampling event was complete.

April 17, 1984

A file memorandum was issued by Mr. Hess regarding the results of the December 27 & 28, 1983 GDC Landfill sampling event. A portion of the memorandum states:

"The organic and heavy metal contaminants found in the water samples obtained from the two (2) on-site monitoring wells are not attributed to this site or its buried hazardous waste. The rationale for this evaluation was drawn from the following on-site observations of the site conditions:

1. *The two (2) monitoring wells are located outside of the pit's clay side-wall lines and clay dike.*
2. *The water table elevation at the two wells and the surrounding area is some 20 to 30 feet above the water table elevation of the landfill.*
3. *The shallow groundwater at both wells is surmised to be flowing towards the open depression near the center of the landfill.*

4. *There are three (3) known hazardous waste areas upgradient of these wells that are credited with their contamination. (The Grand Calumet River is influencing well #1, and the City Service and Conservation Chemical disposal sites are influencing well #2).*

Therefore, these two (2) monitoring wells are considered to be upgradient wells with contamination from other sources.

The organic contaminants found in the "west ditch" sample are attributable to this site. Indiana State Board of Health site inspector have noted the discharge of site leachate to this shallow surface water body. However, the heavy metal contamination of the ditch as indicated by the sample results is attributed to the Vulcan Material Plant's surface impoundment that lies less than 50 feet west of this ditch."

July 26, 1984

A groundwater monitoring sampling event was conducted at the GDC Landfill. [See July 24, 1985 entry.]

August 29, 1984

A formal administrative hearing was held for Cause No. N-146 regarding the January 23, 1984 appeal by GDC of the revocation by ISBH of their four (4) special waste permission letters.

September 10 & 11, 1984

Another formal administrative hearing was held for Cause No. N-146 regarding the January 23, 1984 appeal by GDC of the revocation by ISBH of their four (4) special waste permission letters.

September 19, 1984

An inspection of the GDC Landfill groundwater monitoring program was conducted by Harding Lawson Associates for A.T. Kearney, Inc. as contracted by U.S. EPA Region V. The final report was issued on October 12, 1984.

December 14, 1984

An Comprehensive Monitoring Evaluation ("CME") inspection was performed by ERTEC for the GDC Landfill. The report noted the following:

- *A review of the...checklist shows that virtually every facet of RCRA-required groundwater monitoring is insufficient, inadequate, or completely lacking at this site.*

Because of the magnitude of the problem, HLA [Harding Lawson Associates] did not list every deficiency item noted on the check list on the list of major deficiencies. We feel that the situation is covered by the general statements made on the list of deficiencies (i.e., "...the existing geologic and hydrologic data [are] insufficient," and "...due to the method of construction, the monitoring wells are inadequate for RCRA groundwater monitoring," etc.).

- Few of the documents required by RCRA have been completed. These include: the groundwater monitoring program, the groundwater sampling and analysis plan, and an outline of the groundwater assessment program.*

- Many of the groundwater quality parameters required by RCRA regulations have not been established at the [GDC Landfill].*

- The existing geologic and hydrologic data [are] insufficient.*

- Due to the method of construction, the monitoring wells are inadequate for RCRA groundwater monitoring. The monitoring wells were installed in a hole which was excavated by a backhoe and was then backfilled with sand around a screen. Bentonite or concrete seals were not installed; thus, the wells are subject to contamination from surface [water]. One well (S) [the south well?] was completed utilizing a steel casing, which was observed to be completely rusted through at the surface. All four existing wells contain bottom sediment, but since information concerning the original well depths was not available, the efficacy of the well screens could not be determined. In the event [the GDC Landfill] is required to do RCRA monitoring, new wells will have to be installed and properly completed in order to meet existing regulatory standards.*

- Suitable water collection, sample preservation, and chain-of-custody and preparation procedures have not been developed [nor] utilized.*

- Since existing ground elevations at the site were not available, conclusive information concerning the direction of groundwater flow and hydraulic gradient could not be determined at this time.*

February 11, 1985

The Division of Land Pollution Control, ISBH received GDC's operating permit renewal application for the GDC Landfill.

March 15, 1985

Judge James M. Garrettson, Hearing Officer of the Indiana Environmental Management Board, denied a petition to introduce newly discovered evidence by GDC for Cause No. N-146.

March 18, 1985

A letter was issued to Mr. Hagen from Mr. Klepitsch formally requesting GDC to submit its Part B permit application for the GDC Landfill.

March 29, 1985

A letter was issued to Mr. Hagen from Mr. Jeffrey W. Stevens, Division of Land Pollution Control, ISBH, regarding GDC's failure to submit proof of financial assurance for closure/post-closure or liability coverage pursuant to 320 IAC 4-7-1 through 4-7-36.

April 1, 1985

Judge Garrettson issued his Findings of Fact, Conclusions of Law, and Recommended Order for Cause No. N-146. [*Fill in Findings and Recommendations*].

Judge Garrettson's Conclusions of Law were:

1. GDC was not in compliance with the Agreed Order, [Cause No. N-53], of February 18, 1983;
2. GDC was not in compliance with its [Construction Permit No. SW-133], as amended, of February 18, 1983;
3. GDC was not in compliance with its [Operating Permit No. 45-2], as amended, of February 18, 1983; and
4. GDC was not in compliance with operating standards on three (3) of four (4) inspections conducted between issuance of the Agreed Order, [Cause No. N-53], on February 18, 1983, and the issuance of the four (4) denial letters on January 3, 1984.

Judge Garrettson's Recommended Order included:

1. That the issuance of the four (4) denial letters on January 3, 1984, is affirmed; and
2. That the Agreed Order [Cause No. N-53] of February 18, 1983, continues in effect and that GDC may apply for permission to dispose of special waste pursuant to that Agreed Order, subject to the following:
 - a. No special waste may be accepted at the GDC Landfill until GDC submits the soil boring contemplated by Paragraph No. 7 of the Agreed Order [Cause No. N-53] of February 13, 1984;

- b. No special waste may be accepted at the GDC Landfill until GDC submits as-built plans to the Respondent evidencing compliance with its amended construction permit;
- c. In the event that GDC requests special permission for the disposal of special waste from one of the sources listed in Paragraph No. 8(b) of the Agreed Order [Cause No. N-53], GDC shall submit with such request such evidence as it may possess as to the quality and quantity of such waste disposed of at the GDC Landfill from February 18, 1983, until the present, and an analysis of the quality and quantity of such waste as is proposed for disposal; and
- d. Until such time as GDC develops promulgated standards for the disposal of "special" waste, the burden of proof as to the issue of whether "special" waste from sources listed in Paragraph No. 8(b) of the Agreed Order [Cause No. N-53] has changed in quality or quantity, shall be on the Respondent.

April 16, 1985

A letter was issued to Mr. Stevens and Ms. Schmidt of ISBH from Mr. Krebs regarding correspondence issued to GDC by Mr. Stevens and Ms. Schmidt on March 29 and April 1, 1985, respectively. Mr. Stevens' letter requested proof of financial assurance for closure under 320 IAC 4-7. Ms. Schmidt's letter requested that GDC submit a groundwater sampling and analysis plan pursuant to 40 CFR 265. Mr. Krebs responded that the GDC Landfill is not a hazardous waste landfill.

May 1, 1985

Letter issued to Mr. Krebs from ISBH in response to April 16, 1985 correspondence.

June 17, 1985

An inspection of the GDC Landfill was conducted by Messrs. Ted Warner and Thomas Russell of the Compliance Monitoring Section and Enforcement Section, ISBH, respectively. During the inspection, Mr. Hagen admitted to accepting twenty-eight (28) to thirty-three (33) loads of manifested paint sludge from ACS in 1980 or 1981. Additionally, Mr. Hagen stated that GDC accepted broken battery cases and neutralized calcium sulfate sludge from U.S.S. Lead. Mr. Warner stated that he believed that the broken battery cases to be a characteristically-lead (D008) hazardous waste. Mr. Hagen was only able to show Mr. Warner compliance with two (2) aspects of the regulatory requirements for hazardous waste landfills: an artificial barrier and control of entry. Mr. Warner observed the leachate collection pond and noted that it was discolored. Mr. Hagen noted that the liquid within the leachate collection pond had never been

sampled. Lastly, Mr. Hagen stated that the four (4) monitoring wells were sampled for only 330 IAC 4 parameters.

July 24, 1985

The results of the groundwater samples obtained during the July 26, 1984, sampling event were submitted by Mr. Gregory A. Busch, Quality Assurance Officer, ISBH, to Ms. Schmidt. The results noted that levels for chemical oxygen demand and total organic carbon are very high in most of the samples, indicating organic chemical contamination. Additionally, there were twenty (20) violations of interim primary and secondary drinking water levels under the Safe Drinking Water Act.

July 30, 1985

A groundwater sampling event was conducted at the GDC Landfill. Four (4) samples were obtained. [See November 13, 1985 entry.]

August 2, 1985

A letter was issued to Mr. Ronald E. Golden, Production Manager, U.S.S. Lead, from Mr. Doyle requesting copies of hazardous waste manifests or other records for hazardous waste shipped to the GDC Landfill.

September 16, 1985

A letter was issued to Mr. D. L. Bidwell, Vice-President and General Manager, U.S.S. Lead, from Mr. Doyle responding to correspondence from U.S.S. Lead on August 14, 1985, requesting clarification of the August 2, 1985 letter requesting information related to hazardous waste shipments to the GDC Landfill. The letter from Mr. Doyle noted that the letter was not an Order, but merely a request and that U.S.S. Lead need not reply to the letter as ISBH would obtain the necessary information through other means.

October 22, 1985

An enforcement referral was issued to Mr. Miner from Mr. Lamm due to GDC's failure to obtain interim status and yet accept hazardous waste for disposal. The referral noted that GDC was in complete violation of 320 IAC 4-6 (40 CFR 265).

November 13, 1985

The results of the groundwater samples obtained during the July 30, 1985, sampling event were submitted by Mr. Busch to Ms. Schmidt. Mr. Busch noted there were twelve (12)

violations of interim primary and secondary drinking water levels under the Safe Drinking Water Act.

November 15, 1985

The EMB held a meeting to discuss the matters related to the GDC Landfill.

December 16, 1985

An inspection of the GDC Landfill was conducted by Messrs. Duane Leith, Engineering Section, Division of Land Pollution Control, ISBH; Steve Schafer, and Richard T. Jones. The individuals walked the site and observed numerous leachate leaks. The west wall had several small leachate leaks which drained into a flooded ditch between the GDC Landfill and Vulcan. The west wall was the wall under scrutiny for proper clay thickness. Although Mr. Hagen claimed to have approximately six (6) to ten (10) feet of clay, the soil borings [*determine when the soil borings were taken*] through the west wall indicated only two and one-half (2.5) feet of clay. Therefore, according to Mr. Jones, the soil boring conditions have not been met according to the court order [*determine which court order this is*]. Additionally, Mr. Jones noted that the monitoring well on the west side of the GDC Landfill was under water. Mr. Jones was also concerned about runoff collected outside the north wall between the railroad tracks and the GDC Landfill. Mr. Jones identified a drainage ditch that bisected the GDC Landfill. Apparently, the collected runoff from the site was pumped into the Grand Calumet River. A telephone conversation between Mr. Leith and Mr. Joseph Kriger, Division of Water Pollution Control, ISBH, on January 7, 1986, revealed that the GDC Landfill did not possess a NPDES permit. Mr. Jones also noted that leachate from the eastern bank was rapidly flowing into the drainage ditch. According to Mr. Jones, the clay utilized for daily cover was being obtained from the drainage ditch, thus complicating the drainage problems.

February 25, 1986

A memorandum was issued to Mr. Miller from Mr. Leith discussing the review of GDC's operating permit renewal application submitted to ISBH on February 11, 1985. Mr. Leith noted that approval of the permit renewal was not recommended due to frequent noncompliance and deviations from the construction plans as approved by Agreed Order, Cause No. N-53, including:

1. *Six of the 28 inspections from August 10, 1982, to August 8, 1985, were rated as unacceptable. The facility has not been substantially in compliance with 330 IAC 4-5-13, therefore, denial is required by 330 IAC 4-8-2(a). Sixty percent of the inspections from the 1983 calendar year were rated unacceptable. This is greater than the 40 percent unacceptable ratings allowed in paragraph 9 of the Agreed Order.*

2. *Item 7 of the Agreed Order specifies soil borings and tests to be performed on the site's west section of the clay perimeter wall. The Order requires that four soil borings be taken. The Order requires that five shelby tube samples be taken, but only four were reported, one from each boring. The information requested on the split spoon samples has not been provided for borings B-1 through B-3. Specifically, the record of blow counts and the log of observations, including any irregularities or voids encountered, must be submitted.*

This detailed information presented from boring B-4 does show that there is only two and one-half feet of clay at nine to 11 1/2-foot depth from the surface. Above this is landfill and clay intermixed, and below the clay is sand. Page 12 of the construction plans, received November 17, 1980, which the EMB approved, and which the February 16, 1982, permit renewal and subsequent order referred to, details the wall construction.

The wall was to have been 25-30 feet in width keyed into the underlying clay to a depth of three feet and with a total depth of over 30 feet. The wall was to slant outward at the top or toward the property line on a one-to-one slope. A vertical boring through the wall under those conditions would encounter 25 feet of clay. The two and one-half foot thickness of clay encountered, shows that the wall thickness is inadequate. It shows that the wall is not keyed into the underlying clay at that point due to the occurrence of sand beneath the clay.

3. *Drainage swale A, as shown on sheet 2 of the plans, has not been properly constructed. There is a low spot in this area in which water ponds.*
4. *Leachate collection components have not been installed, as shown on sheets 3 and 8 of the plans, yet filling has progressed beyond the interim grading stage, shown on sheet 3.*
5. *Leachate seeps, along the central low area and along the north area, are not being controlled or stopped. This leachate flows directly into, or is washed by precipitation run-off, to the surface water collection pond from which it may be pumped into the Grand Calumet River. There are leachate seeps along the west wall near the water ponded in that area.*
6. *The vegetative cover has not been established as on page 12 of the Narrative.*

The following points should also be considered:

1. *The amount of clay available for wall construction and cover visually appears to be inadequate. Calculations based on the renewal map received February 11, 1985, and on the proposed excavation depth of 37 feet, projected adequate*

volume of clay. A recent site visit casts doubt on the accuracy of the renewal map and on the practicality of excavating 37 feet in an area already plagued with voluminous leachate flows, groundwater infiltration, and precipitation accumulation. A survey is needed to closely determine the area remaining for excavation and to project a realistic excavation depth in order to verify the adequacy of clay volume.

2. *Groundwater samples taken on July 26, 1984, and on July 30, 1985, both exhibit groundwater contamination. Levels of numerous parameters are above the interim primary and secondary drinking water levels.*

March 13, 1986

A memorandum was issued to Mr. Miner from Mr. Kenneth Fenner, Chief, Water Quality Branch, U.S. EPA Region V, regarding the possible illegal point-source discharge to the Grand Calumet River by GDC. The memo referenced the December 16, 1985 inspection by representative of ISBH.

March 27, 1986

A letter was issued to Mr. Donald Larson, Chief, Compliance Section, Division of Water Pollution Control, ISBH, from Mr. Michael Mikulka, Chief, Enforcement Unit II, Water Quality Branch, U.S. EPA Region V, regarding an unpermitted discharge from the GDC Landfill into the Grand Calumet River.

April 18, 1986

A file memorandum was issued by Mr. Timothy J. Miller, Geology Section, Division of Land Pollution Control, ISBH, regarding a review of the groundwater sampling results dated November 6, 1985, and February 12, 1986. Mr. Miller noted that, since 1981, GDC has failed to sample for RCRA parameters, including National Primary Drinking Water Standards and the four (4) indicators of groundwater quality. Mr. Miller noted that he has made an enforcement referral to U.S. EPA Region V.

May 27, 1986

An inspection of the GDC Landfill was attempted at 9:00am by Mr. Cleaton. The scale manager informed Mr. Cleaton that Mr. Hagen was not available and would, most likely, be back around 11:00am. Mr. Cleaton informed the scale manager that he would return at 2:00pm and expected Mr. Hagen to be present at that time.

Upon returning at 2:00pm, Mr. Cleaton was informed that Mr. Hagen was still at lunch. Mr. Cleaton provided two (2) copies of his business card to the scale manager and informed him that he would conduct another inspection on June 18, 1986, at approximately 9:00am.

May 30, 1986

A Complaint and Compliance Order (RCRA V-W-86-R-45) was issued to GDC by U.S. EPA Region V. The Findings and Orders are listed below:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

GARY DEVELOPMENT COMPANY, INC.
479 NORTH CLINE AVENUE
P.O. BOX 6056
GARY, INDIANA 46406
IND 077 005 916

DOCKET NO. V-W-86-R-45

COMPLAINT AND
COMPLIANCE ORDER

PREAMBLE

This Complaint and Compliance Order is filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), 42 USC §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter U.S. EPA). The Respondent is Gary Development Company, Inc., as owner and operator of Gary Development Company, Inc.

This Complaint and Compliance Order is based on information available to U.S. EPA, including the Respondent's Part A of the RCRA Permit Application, dated November 1980; a U.S. EPA contracted ground-water monitoring inspection report dated October 1984; and an inspection report and correspondence from the Indiana State Board of Health (ISBH). Based on the review of these documents, violations of applicable State and Federal regulations have been identified.

Pursuant to Section 3008(a)(1) of RCRA, 42 USC §6928(a)(1), and based on information obtained from review of documents related to site hydrogeology, past inspections of the site, and the Part A of the RCRA permit application, it has been determined that the Respondent is in violation of Subtitle C of RCRA.

Specifically, Respondent has been determined to be in violation of Sections 3004 and 3005, 42 USC §§6924 and 6925, U.S. EPA regulations at 40 CFR 270.1(b), 270.10(a), and the Indiana Administrative Code (IAC), Ind. Rev. Stat. 1985, as amended, and regulations adopted by the Indiana Environmental Management Board, including Title 320 IAC 4.1-38-1; 4.1-34-1(a); 4.1-20-1(a); 4.1-20-2; 4.1-20-3(a) through (e); 4.1-20-4(a) through (f); 4.1-20-5; 4.1-22-24(a) and (b); 4.1-16-4; 4.1-17-3(a) through (c); 4.1-18-2; 4.1-19-2(a)(1) and (5); 4.1-19-7; 4.1-19-4(b)(1) and (2); 4.1-16-6(d); 4.1-16-6(b)(1); 4.1-16-5(c); and 4.1-21-3(a).

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Section 2002(a)(1), 3006(b) and 3008(a)(2) of RCRA; 42 USC §§6912(a)(1), 6926(b) and 6928(a)(2), respectively.

On August 18, 1982, the State of Indiana was granted Phase I Interim Authorization by the Administrator of U.S. EPA pursuant to Section 3006(b) of RCRA, 42 USC §6926(b), to administer a hazardous waste program in lieu of the Federal program. See 47 Federal Register 3953. As a result, facilities in Indiana qualifying for interim status under 40 CFR 270.70 are regulated under the Indiana provisions found at 320 IAC 4.1, et seq., rather than the Federal regulations set forth at 40 CFR Part 265, Section 3008(a)(2) of RCRA, 42 USC §6928(a)(2), provides that U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program. Notice to the State pursuant to this section has been provided by U.S. EPA.

FINDINGS

1. Respondent owns and operates a hazardous waste management facility named Gary Development Company, Inc., located at 479 North Cline Avenue, Gary, Indiana 46406. Respondent is an Indiana Corporation whose registered agent in Indiana is CT Corporation System, 1 North Capitol Avenue, Indianapolis, Indiana 46204.
2. Section 3010 of RCRA, 42 USC §6930, requires any person who generates or transports hazardous waste, or who owns or operates a facility for the treatment, storage, or disposal of hazardous waste to notify U.S. EPA of such activity within ninety (90) days of the promulgation of regulations under Section 3001 of RCRA, 42 USC §6921. Section 3010 of RCRA also provides that no hazardous waste subject to U.S. EPA regulation may be transported, treated, stored, or disposed of unless the required notification has been given.
3. U.S. EPA published regulations concerning the generation, transportation, and treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste handling was required in most instances no later than August 18, 1980.

4. Section 3005 of RCRA, 42 USC §6925, requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA Permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 124, 270 and 271. The regulations require persons who treat, store, or dispose of hazardous waste to submit Part A of the permit application in most instances no later than November 19, 1980.
5. Section 3005(e) of the Act provides that an owner or operator of a facility is authorized to operate a hazardous waste treatment, storage or disposal facility pending final administrative disposition of a permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of the Act concerning notification of hazardous waste activity have been complied with; and (3) application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.
6. Respondent did not file a timely notification of its hazardous waste activity to U.S. EPA, by submission of EPA Form 8700-12, as required by Section 3010(a) of RCRA, 42 USC §6930(a). On September 10, 1980, which is 23 days after the August 18, 1980, deadline for submission of this notification, the Vice-President of the facility called U.S. EPA to request a copy of the form, which he admitted had not been sent to U.S. EPA. To date, no notification form from Respondent is on file at U.S. EPA.
7. On November 18, 1980, Part A of the RCRA permit application was submitted by Respondent as required by Section 3005(a) of RCRA, 42 USC §6925(a), and 40 CFR 270.1(b). The Part A permit application identifies the hazardous waste management process as disposal in a landfill (D80) and identifies the owner and the operator as Gary Development Company, Inc.
8. Interim status has never been achieved by Respondent because the facility failed to notify by August 18, 1980.
9. Part A of Respondent's RCRA permit application lists the following hazardous wastes handled by the facility:
 - a. F006 - wastewater treatment sludges from electroplating operations (320 IAC 4.1-6-2);
 - b. K087 - decanter tank tar sludge from coking operations (320 IAC 4.1-6-3); and
 - c. F003 and F005 - two separate lists of specified, spent, non-halogenated solvents and still bottoms from the recovery of those solvents (320 IAC 4.1-6-2).

10. Pursuant to Title 329 Indiana Administrative Code (IAC) 4.1-10-2, generators of hazardous waste in Indiana must submit to the Technical Secretary of the Indiana Environmental Management Board (EMB) biennial reports which specify to whom their hazardous waste have been sent in the preceding calendar year. These reports must be certified as true by the generators under penalty of law.
- a. EMB has received certified annual reports pursuant to 320 IAC 4.1-10-2 from at least two generators who report that they sent hazardous wastes to Respondent in the calendar year 1981. These generators are Indiana Harbor Works, U.S. EPA I.D. No. IND 005 462 601, and American Chemical Service, U.S. EPA I.D. No. IND 016 360 265.
 - b. Between December 5, 1980, and November 16, 1981, American Chemical Service delivered at least 37 manifested shipments of "flammable liquid paint sludge" to Respondent for disposal. American Chemical Service used hazardous waste number F005 to describe the waste. F005 refers to specific non-halogenated solvents and still bottoms. Each shipment consisted of one (1) tank containing 2,750 gallons.
 - c. U.S. EPA correspondent with Respondent's former attorney, Mr. Kyle, dated February 8, 1984, states that a review of the process generating wastes at American chemical Service was undertaken. The conclusion reached was that any of the following hazardous waste types handled at the American Chemical Service facility might be present in wastes disposed of at Respondent's landfill:
 - (i) Hazardous wastes listed at 320 IAC 4.1-6-2:
 - (A) F001 - listed spent halogenated solvents used in degreasing;
 - (B) F002 - listed spent halogenated solvents and still bottoms;
 - (C) F003 - listed spent non-halogenated solvents and still bottoms;
 - (D) F005 - listed spent non-halogenated solvents and still bottoms;
 - (ii) D001 - Hazardous wastes exhibiting the characteristic of ignitability noted at 320 IAC 4.1-5-2(b); and
 - (iii) Hazardous wastes listed at 320 IAC 4.1-6-4(f):
 - (A) U002 - acetone
 - (B) U031 - 1 - butanol
 - (C) U112 - acetic acid, ethyl ester
 - (D) U147 - 2,5 - furandione
 - (E) U154 - methanol

- d. During an ISBH inspection June 17, 1985, a representative of the facility, Mr. Hagen, stated that Respondent had accepted neutralized acid and broken battery casings delivered by U.S.S. Lead Refinery, Inc. (IND 047 030 226). Such wastes are possibly hazardous due to the characteristics of corrosivity (D002) and high concentrations of lead (D008) (320 IAC 4.1-5-3(b) and 4.1-5-5 respectively). This is asserted in an ISBH memorandum dated July 29, 1985.
- 11. In a March 18, 1985 letter, U.S. EPA requested Respondent to submit Part B of its application for a RCRA permit pursuant to 40 CFR 270.1(b). To date, neither U.S. EPA nor ISBH has received the Part B from Respondent.
- 12. Respondent did not submit a Part B permit application, nor certify compliance with applicable RCRA groundwater monitoring and financial requirements by November 8, 1985. Section 3005(e)(2) of RCRA and 40 CFR Part 265 required such permit application and a certification from owners and operators of land disposal facilities in existence on November 19, 1980, in order to continue to operate after November 8, 1985. Therefore, Respondent is precluded from accepting any additional hazardous waste and must close its facility.
- 13. Harding Lawson Associates, contracted by U.S. EPA, performed a groundwater monitoring inspection at Respondent's facility on September 19, 1984. That inspection determined that Respondent's groundwater monitoring program and monitoring well system did not meet RCRA regulations. The following violations of IAC were identified:
 - a. Failure to implement a groundwater monitoring program capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility (320 IAC 4.1-20-1(a)) by:
 - (i) Installing monitoring wells (at least one) hydraulically upgradient from the limit of the waste management area (320 IAC 4.1-20-2(a)(1));
 - (ii) Installing monitoring wells (at least three) hydraulically downgradient at the limit of the waste management area (320 IAC 4.1-20-2(a)(2));
 - (iii) Ensuring that upgradient wells yield groundwater:
 - (A) Representative of background groundwater quality in the uppermost aquifer near the facility (320 IAC 4.1-20-2(a)(1)(i)); and
 - (B) That is not affected by the facility (320 IAC 4.1-20-2(a)(1)(ii));
 - b. Failure to install wells in a manner that maintains the integrity of the monitoring well boreholes (320 IAC 4.1-20-2(c));

- c. Failure to develop, follow, and keep at the facility a groundwater sampling and analysis plan including procedures and techniques for:
 - (i) Sample collection;
 - (ii) Sample preservation and shipment;
 - (iii) Analytical procedures; and
 - (iv) Chain-of-Custody control (320 IAC 4.1-20-3(a));
- d. Failure to test groundwater quarterly for one year to establish background concentrations of specified parameters in samples obtained from monitoring wells (320 IAC 4.1-20-3(b) and (c)); these parameters are:
 - (i) Those characterizing the suitability of groundwater as a drinking water supply (320 IAC 4.1-20-3(b)(1)) and (320 IAC 4.1-32-3);
 - (ii) Those establishing groundwater quality (320 IAC 4.1-20-3(b)(2)); and
 - (iii) Those used as indicators of groundwater contamination (320 IAC 4.1-20-3(b)(3));
- e. Failure to obtain for the indicator parameters four replicate measurements of each sample collected from upgradient wells to determine initial background arithmetic mean and variance by pooling replicate measurements for specified parameters during the first year of monitoring (320 IAC 4.1-20-3(c));
- f. Failure to obtain and analyze groundwater samples for parameters on an annual or semiannual schedule (320 IAC 4.1-20-3(d));
- g. Failure to determine and record the elevation of the groundwater surface each time a sample is obtained (320 IAC 4.1-20-3(e));
- h. Failure to evaluate groundwater surface elevations annually to determine whether monitoring wells are properly located (320 IAC 4.1-20-4(f));
- i. Failure to prepare an outline of a more comprehensive groundwater quality assessment program as required (320 IAC 4.1-20-4(a));
- j. Failure to comply with 320 IAC 4.1-20-4(b) through (d), statistically evaluating any changes in parameters in downgradient wells compared to those in the upgradient wells.
- k. Failure to keep records of the analyses required in 329 IAC 4.1-20-3(c) and (d) and 320 IAC 4.1-20-5, associated groundwater surface elevations, and the

statistical calculations and evaluations required in 320 IAC 4.1-20-4(b) throughout the active life of the facility (320 IAC 4.9-20-5(a)(1));

1. Failure to report specified groundwater monitoring information to the Technical Secretary and Regional Administrator as required by 320 IAC 4.1-20-5(a)(2) and 40 CFR 265.94(a)(2).
14. In a letter dated May 5, 1985, ISBH notified Respondent of violations of financial assurance requirements discovered during a records review on March 26, 1985. No hazardous waste facility certificates of liability insurance have been received at ISBH as required by 320 IAC 4.1-22-24(a) and (b). Respondent has not yet achieved compliance with these requirements.
15. An inspection performed by ISBH on June 17, 1985, found the following violations at Respondent's facility:
 - a. No general waste analyses were on file for hazardous wastes received, as required by 329 IAC 4.1-16-4(a).
 - b. No general waste analysis plan was on file, as required by 320 IAC 4.1-16-4(a).
 - c. No functional internal communications system was found (320 IAC 4.1-17-3(a)) nor were telephones or two-way radio systems immediately available to summon emergency assistance, as required by 320 IAC 4.1-17-3(b).
 - d. Functional emergency equipment was not found, as required by 320 IAC 4.1-17-3(c) and (d).
 - e. A contingency plan, as required by 320 IAC 4.1-18-2, was not found on file.
 - f. Apparent violations of the manifesting procedures found at 320 IAC 4.1-19-2(a)(1) and (5) were observed. Unmanifested wastes were accepted without filling out forms required at 320 IAC 4.1-19-7.
 - g. Records were not available indicating the description and quantity of waste received or the dates wastes were received and disposed of, as required by 320 IAC 4.1-19-4(b)(1).
 - h. Records were not available indicating disposal locations or quantities of each hazardous waste placed at those locations within the facility, as required by 320 IAC 4.1-19-4(b)(2).

- i. Inspection logs indicating dates, times and inspections were not kept, as required by 320 IAC 4.1-16-6(d).
 - j. Inspections of emergency equipment and security devices were not conducted, as required by 320 IAC 4.1-16-6(b)(1).
 - k. "Danger" signs were not posted, as required by 320 IAC 4.1-16-5(c).
16. On March 29, 1985, ISBH sent a letter to Respondent notifying the facility of lack of compliance with requirements as follows:
- a. No proof of financial assurance for closure/post-closure had been submitted, as required by 320 IAC 4.1-22-5 through 4.1-22-12 and 320 IAC 4.1-22-14 through 4.1-22-23.
 - b. No proof of liability coverage for sudden and non-sudden accidental occurrences had been submitted, as required by 320 IAC 4.1-22-24.
17. ISBH received an inadequate response from Respondent on April 16, 1985, regarding the deficiencies stated in Finding 16 above.

ORDER

Respondent having been initially determined to be in violation of Section 3004 and 3005 of RCRA and those portions of 320 IAC 4.1 specified above, the following Compliance Order pursuant to Section 3008(a)(1) of RCRA, 42 USC §6928(a)(1), is entered.

- A. Respondent shall, within thirty (30) days of this Order becoming final:
- 1. Prepare and submit a closure plan and post-closure plan to the Indiana Department of Environmental Management (IDEM), with a copy to Complainant, in accordance with 320 IAC 4.1-21 and 4.1-28 which will result in closure of the facility. These plans shall describe activities which will:
 - a. Minimize the need for further maintenance (320 IAC 4-21-2(a)); and
 - b. Control, minimize, or eliminate post-closure escape of hazardous waste or hazardous waste constituents to the environment (320 IAC 4.1-21-2(b)).

The plans must describe activities which will meet the requirements for landfill closure and post-closure care (320 IAC 4.1-28-4), indicate how they will be achieved, schedule the total time required to closure the facility (320 IAC 4.1-21-

3(a)(4)), and describe continued post-closure maintenance and monitoring for a minimum of thirty (30) years after the date of completing closure.

2. Submit to IDEM, with a copy to Complainant:

- a. A written cost estimate for closure of the facility in accordance with the closure plan, as required by 320 IAC 4.1-22-3(a);
- b. A written estimate of the annual cost of post-closure monitoring and maintenance of the facility in accordance with the applicable post-closure regulations at 320 IAC 4.1-22-13(a);
- c. Evidence of financial assurance for both closure and post-closure care of the facility as specified at 320 IAC 4.1-22-4, 4.1-22-14 and 4.1-22-23;
- d. Evidence of financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operation of the facility, as required by 320 IAC 4.1-22-24(a); and
- e. Evidence of financial responsibility for bodily injury and property damage to third parties caused by non-sudden accidental occurrences arising from operation of the facility, a requirement stated at 320 IAC 4.1-22-24(b).

B. Respondent shall, within thirty (30) days of this Order becoming final, submit to U.S. EPA and IDEM for approval, a plan and implementation schedule (not to exceed 120 days) for a groundwater quality assessment program to be put into effect at Respondent's landfill. This program must be capable of determining whether any plume of contamination has entered the groundwater from the landfill, and if so, the rate and extent of migration and the concentrations of hazardous waste or hazardous waste constituents in the groundwater as stated at 320 IAC 4.1-20-4(a). the plan must specify:

1. Methodology which will be used to investigate site-specific geology and subsurface hydrology at Respondent's landfill in order to yield:
 - a. A determination of the thickness and a real extent of the uppermost aquifer at the site and any interconnections which may exist between it and lower aquifers;
 - b. Aquifer hydraulic properties determined from lithologic samples, slug tests, or pumping tests;

- c. A site water-table contour map from which groundwater flow direction and gradient can be determined; and
 - d. Identification of regional and local areas of recharge and discharge of groundwater.
2. Proposed location, depth, and construction specifications for each monitoring well. The proposed well system must consist of monitoring wells placed in the uppermost aquifer and in each underlying aquifer which is hydraulically interconnected such that:
- a. At least one background monitoring well is installed hydraulically upgradient (i.e., in the direction of increasing static head) from the limit of the waste management area. The number of wells, their locations, and depths must be sufficient to yield groundwater samples that are:
 - (i) Representative of background groundwater quality in the uppermost aquifer and all aquifers hydraulically interconnected beneath the landfill; and
 - (ii) Not affected by the landfill itself.
 - b. At least three monitoring wells are installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the waste management area. Their number, locations and depths must ensure that they immediately detect any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area.

Monitoring wells must be cased in a manner that maintains the integrity of the monitoring well borehole. This casing must be screened or perforated and packed with gravel or sand where necessary to enable sample collection at depths where appropriate aquifer flow zones exist. The annular space (i.e., the space between the borehole and well casing) above the sampling depth must be sealed with a suitable material (e.g., cement grout or bentonite slurry) to prevent contamination of samples and the groundwater.

3. The hazardous wastes (defined at 320 IAC 4.1-3-3) and hazardous waste constituents (defined at 320 IAC 4.1-1-7 and listed at 320 IAC 4.1-5-5 and 4.1-6-8) which will be analyzed for in groundwater samples and the basis for selection of those specific constituents (e.g., information stated on

manifests of hazardous wastes accepted for disposal at Respondent's landfill, information available from general waste analyses kept at the landfill, etc.);

4. A sample collection plan that contains the following:
 - a. A detailed description of sample-collection procedures;
 - b. Recording of groundwater elevations at each sampling;
 - c. Written procedures for sample preservation and shipment of groundwater samples that address each constituent for which groundwater is being analyzed to ensure accurate laboratory results;
 - d. A written record and plan showing chain-of-custody control for samples from the time of collection until analyses are performed;
 - e. A written description of analytical procedures to be used by laboratories to analyze the groundwater samples; and
 - f. A written schedule for collection of samples.
 5. Procedures for evaluating analytical results to establish the presence or absence of any plume of contamination that may be found and schedules for reporting such results to U.S. EPA and IDEM.
- C. Respondent shall:
1. Implement the closure plan, after it has been approved by IDEM, as required by 320 IAC 4.1-21-4(a); and
 2. Implement the post-closure plan, as approved by IDEM.
- D. Respondent shall implement the groundwater quality assessment program, as approved by Complainant and IDEM, within 120 days of the approved date.
- E. Respondent shall, within fifteen (15) days after carrying out the plan for a groundwater quality assessment program, submit to the Technical Secretary of the IDEM and to the U.S. EPA a written report containing the results of the groundwater quality assessment.

- F. Respondent shall, within thirty (30) days of receipt of this Order, post "Danger" signs in accordance with 320 IAC 4.1-26-5(c).
- G. Respondent shall continue the current practice of not accepting hazardous waste for disposal.

The Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted not later than forty-five (45) days after this Order becomes final to the U.S. EPA, Region V, RCRA Enforcement Section, 230 South Dearborn Street, Chicago, Illinois 60604.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 USC §6973, or any other applicable statutory authority, should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment.

ASSESSMENT OF PENALTY

Based upon the violations cited herein, and pursuant to Section 3008(g) of RCRA, 42 USC §6928(g), U.S. EPA assesses a penalty of ONE HUNDRED SEVENTEEN THOUSAND DOLLARS (\$117,000) against the Respondent. The proposed penalty has been set at the indicated level based upon an analysis of the seriousness of the violations cited herein and the conduct of the Respondent. Payment shall be submitted within sixty (60) days of entry of this Order in the form of a certified or cashier's check made payable to the Treasury of the United States of America, and shall be remitted to U.S. EPA, P.O. Box 70753, Chicago, Illinois 60637. Copies of the transmittal of payment shall be sent to both the Regional Hearing Clerk, Planning and Management Division, and the Solid Waste and Emergency Response Branch Secretary, Office at Regional Counsel, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirement of the above Compliance Order shall submit Respondent to liability for a civil penalty of not more than \$25,000 per day for each day of such violation, as provided in Section 3008(c) of RCRA, 42 USC §6928(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has requested a hearing in writing not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator, you must file a written answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of your receipt of this notice. A copy of your answer and any subsequent documents filed in this action should also be sent to Marc M. Radell, Assistant Regional Counsel, at the same address. Failure to answer within thirty (30) days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection act of 1966, 31 U.S.C. §§3701 et seq.

Your answer should clearly and directly admit, deny, or explain each of the factual allegations of which you have knowledge. Said answer should contain: (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which you intend to place at issue. The denial of any material fact or the raising of any affirmative defense shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation of Suspension of Permit, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

Whether or not you request a hearing, you may confer informally with U.S. EPA concerning (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any penalty assessment in relation to the size of your business, the gravity of the violations, and the effect of the penalty on your ability to continue in business.

You may request an informal settlement conference at any time by contacting Mr. Jonathan Cooper at telephone number (312) 886-4464; however, any such request will not effect the 30-day time limit for responding with an answer to this Complaint and Compliance Order. U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences.

DATED this 30th day of May, 1986

Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing Complaint and Compliance Order to be served upon the persons designated below on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified return receipt requested, postage prepaid, at Chicago, Illinois in envelopes addressed to:

CT Corporation System, Registered Agent for
Gary Development Company, Inc.
1 North Capitol Avenue
Indianapolis, Indiana 46204

Mr. Larry Hagen, Vice President
Gary Development Company, Inc.
479 North Cline Avenue
Gary, Indiana 46406

I have further caused the original of the Complaint and Compliance Order, and this Certificate of Service to be served in the office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V at 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last address known to the subscriber.

Dated this 30th day of May 1986.

Jean Sharp, for
Secretary, Hazardous Waste Enforcement Branch

June 5, 1986

A file memorandum was issued by Mr. Schafer regarding an administrative hearing conducted on the GDC Landfill. Mr. Schafer noted, among other things, that his testimony reviewed more recent violations of not applying a clay-type soil for daily cover, and stockpiling demolition wastes, "grinding fluff," and foundry sand instead of applying cover to these wastes. Mr. Hagen testified, according to Mr. Schafer, that GDC applies a daily cover with a mixture of clay and foundry sand and "grinding fluff" is used for traction material. He also testified that they do pump stormwater into the Grand Calumet River. Mr. Schafer noted that two questions were brought up during the hearing: (1) could the water on-site be classified as leachate without analytical testing, and (2) was the amount of clay in the cover material measured.

June 18, 1986

Mr. Cleaton attempted to conduct an inspection of the GDC Landfill at 9:15am. Mr. Cleaton was informed that Mr. Hagen was not at work yet. Mr. Cleaton informed the scale manager that he was rather upset that Mr. Hagen could not keep his appointments and would be referring this matter to the EPA. Mr. Cleaton noted that he would be retiring on July 14, 1986.

July 29, 1986

Mr. Warner issued a memorandum to the GDC file. [*Find this memorandum.*]

August 22, 1986

Mr. Warner attempted to conduct an inspection of the GDC Landfill. Mr. Hagen was not present, but, according to the gate operator, was expected later in the day. Mr. Warner telephoned Mr. Hagen later the same day and was informed that nothing had changed at the GDC Landfill from the date of the last inspection. Furthermore, Mr. Hagen stated that he had not attempted to meet any applicable RCRA or 321 IAC 4.1 regulation. However, Mr. Hagen did reveal that he had engaged in discussions with EPA representatives in an attempt to resolve the matter.

September 20, 1986

Judge Garrettson issued his Recommended Findings, Conclusion, and an Order for the matter between GDC and IDEM in Cause No. N-146.

October 20, 1986

A letter was issued to Mr. Hagen from Mr. Miller requesting that his monthly Special Waste Reports be sent to the Indiana Department of Environmental Management ("IDEM"), rather than the ISBH.

April 20, 1987

A Preliminary Review Report was completed by Ms. Cindy Deal as a part of the RCRA Facility Assessment for the GDC Landfill.

May 19, 1987

A letter was issued to Mr. Hagen from Mr. Miller regarding Mr. Hagen's verbal request to utilize wastewater treatment sludge or sludge-type products for soil conditioners. The letter noted that the Land Application Branch of the Office of Water Management would need to approve of such use before any application could occur.

June 15, 1987

An inspection of the GDC Landfill was conducted by Mr. Leith in order to determine its current elevations, remaining fill area, and remaining borrow area. Mr. Leith noted that the north central portion of the GDC Landfill was close to the previously approved final contours with no significant overfilling. The remaining fill area was noted as approximately eight and one-half (8.5) acres in the center of the GDC Landfill. Mr. Leith observed a small area at the extreme

north central part of the GDC Landfill that could be filled by constructing a clay wall to control leachate.

The remaining fill volume was estimated to be five hundred and eighty thousand five hundred and fifty-five (580,555) cubic yards, which could retain four hundred and sixty-four thousand four hundred and forty-four (464,444) cubic yards of solid waste, if twenty (20) percent of the volume is taken up by daily cover.

Numerous large leachate seeps were observed draining into the low areas in the central and north central parts of the GDC Landfill. Some of the consolidated ash previously landfilled in the eastern portion of the GDC Landfill had been recently excavated and appeared to have been used as daily cover or for purposes of improving the mobility of equipment across the solid waste.

August 27, 1987

An inspection of the GDC Landfill was conducted by Mr. Warner and Mr. Jonathon Cooper, Geologist, U.S. EPA Region V. Mr. Hagen and Mr. Terry R. West, Ph.D., P.E., GDC's engineering and geological consultant, represented GDC during the inspection. During this particular inspection, Mr. Hagen informed Mr. Warner that the only "waste shipments" transported to the GDC Landfill were the shipments from ACS, manifested as F005. However, Mr. Hagen argued that those shipments were not hazardous waste, per Mr. James Tarpo, President of ACS. Additionally, Mr. Hagen changed his story regarding the broken battery cases and neutralized calcium sulfate sludge from U.S.S. Lead. He informed Mr. Warner that such waste was never transported to the GDC Landfill. [See June 17, 1985 entry.]

September 9, 10 & 11, 1987

A formal hearing was held regarding EPA's Complaint and Compliance Order, Cause No. V-W-86-R-45.

September 15, 1987

Mr. Hagen informed Mr. Dean J. Nygard of the Site Investigation Section, Office of Environmental Response, IDEM, that he did not have the authority to conduct the Visual Site Inspection component of the RCRA Facility Assessment. Mr. Hagen stated that he was acting on the advice of his attorney, Mr. Krebs.

March 17, 1988

A Landfill Erosion and Sedimentation Review Worksheet was compiled by Mr. Ed Carns, Supervisor, Lake County Soil & Water Conservation District, for the GDC Landfill. Accompanying Mr. Carns were Mr. Larry Olsterholz, Non-Ag Erosion Control Specialist; Mr.

Roger Nanney, District Conservationist, Soil Conservation Service; and Mr. Schafer. The Worksheet noted areas of erosion, but not off-site sedimentation.

April 28, 1988

Mr. Warner inspected the GDC Landfill.

November 15, 1988

A Landfill Erosion and Sedimentation Review Worksheet was compiled by Mr. Harry Molchan, Supervisor, Lake County Soil & Water Conservation District, for the GDC Landfill. Accompanying Mr. Molchan were Messrs. Olsterholz, Nanney, and Schafer. The Worksheet noted areas of erosion and off-site sedimentation.

December 2, 1988

A letter was issued to Mr. Hagen from Mr. Palin stating that new solid waste regulations would be coming into effect on December 10, 1988. Further, the letter noted that existing solid waste landfills were being evaluated for their acceptability as certified special waste landfills. The letter stated that, pursuant to 329 IAC 2-21-3(d), GDC was being notified that it was not authorized to accept unlimited quantities of special waste pursuant to 329 IAC 2-21-13. Any approvals, therefore, would need to be approved by the Commissioner on a case-by-case basis.

May 13, 1989

A fire at the GDC Landfill was reported by Mr. Novak to Mr. Schafer at 2:30pm. Allegedly, the fire occurred when residue from the East Chicago Sanitary District grinder caught fire. This residue was being used as daily cover at the GDC Landfill. Mr. Schafer and Mr. Rick Reynolds, Office of Air Management, responded to the fire.

May 18, 1989

A Landfill Erosion and Sedimentation Review Worksheet was compiled by Mr. Molchan for the GDC Landfill. Accompanying Mr. Molchan were Messrs. Olsterholz, Nanney, and Schafer. The Worksheet noted areas of erosion and off-site sedimentation.

June 31, 1989

The GDC Landfill ceased operation.

August 29, 1989

A letter was issued to Commissioner Kathy Prosser and Mr. Palin from Mr. Krebs regarding a variance from the new solid waste regulations (329 IAC 2) adopted in August of 1988. Specifically, GDC wanted a variance from 329 IAC 2, including, but not limited to, the closure and post-closure provisions (329 IAC 2-12-1, 2-12-3, 2-14, 2-15-1-8, and 2-25-2) to allow the GDC Landfill to continue to accept solid waste for disposal in the unfilled area only under the regulations existing prior to September 1, 1988. GDC requested the variance for one (1) year, per IC 13-7-7-6.

The letter also noted that the GDC Landfill was operating under the conditions of Agreed Order, Cause No. N-53, as adopted on February 28, 1983 by the EMB. This settlement had allowed GDC's construction and operating permit to each last for a period of two (2) years from the effective date of March 1, 1983. GDC noted that it had filed an application for the renewal of its operating permit before March 1, 1985, but had not received any notification from IDEM regarding its acceptance nor denial.

October 19, 1989

A letter was issued to Mr. Hagen from Ms. Schmidt regarding an adequate groundwater monitoring system at the GDC Landfill. Mr. Hagen had previously called Mr. Gefell on September 11, 1989 to inquire about this information. The letter enclosed a copy of EPA's Technical Enforcement Guidance Document ("TEGD") and also noted that IDEM required no less than one (1) upgradient well and three (3) downgradient wells for RCRA solid and hazardous waste facilities.

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STATE OF INDIANA)	BEFORE THE INDIANA DEPARTMENT OF
) SS:	ENVIRONMENTAL MANAGEMENT AND
COUNTY OF MARION)	INDIANA SOLID WASTE MANAGEMENT
		BOARD

IN RE:)	
)	
GARY DEVELOPMENT COMPANY,)	CAUSE NO. _____
INC.'s PETITION FOR VARIANCE)	
UNDER I.C. 13-7-7-6.)	

REQUEST FOR HEARING

The Petitioner Gary Development Company, Inc., by counsel, hereby requests a hearing on its Petition for Variance, stating as follows:

1. On August 29, 1989, Gary filed with the Commissioner's Office of the IDEM a Petition for Variance from the new Indiana Solid Waste Regulations adopted originally in August 1988 (329 IAC 2), including, but not limited to, the closure and post-closure provisions (329 IAC 2-12-1, 2-12-3, 2-14, 2-15-1-8 and 2-25-2), and to allow Gary to continue to accept for one year non-hazardous solid waste for landfill disposal in an unfilled area under the regulations existing prior to September 1, 1988.
2. On August 29, 1989, Gary notified the IDEM's Commissioner that it was suspending the acceptance of solid waste for landfiling effective August 31, 1989, even though landfiling capacity with an estimated longevity of less than twelve months remained.
3. The remaining fill area had been under dispute and was addressed in an Indiana Environmental Management Board Settlement Agreement in Cause No. N-53 approved on February 28, 1983.
4. On September 30, 1986, the Presiding Officer for the IEMB concluded after conducting an evidentiary hearing in Cause No. N-146 that Gary had submitted the necessary soil borings from its west wall. These are required by the 1983 Settlement Agreement to determine whether the wall complied with the specifications agreed to in paragraph 7(b) of the Settlement Agreement. Thus, pursuant to Section 7(d) of the Settlement Agreement, Gary may construct "further portions of the clay perimeter wall around the site."
5. The reasons supporting the variance from the new SWMB regulations include that:
 - (a) Filling the remaining area with municipal solid waste to the elevation approved in the construction permit and to a contour appropriate and consistent with the surrounding areas would be environmentally beneficial, and
 - (b) Applying the new regulations would create an undue hardship because of the very short remaining life of the facility.

WHEREFORE, Gary Development Company, Inc., by counsel, requests a hearing on its Petition for Variance made pursuant to I.C. 13-7-7-6.

PARR, RICHEY, OBREMSKEY & MORTON

Attorneys for Petitioner, Gary
Development Company, Inc.

By _____
Warren D. Krebs

November 9, 1989

A memorandum was issued to Mr. Tom Newby, Office of Legal Counsel, from Mr. Gefell regarding GDC's request for a variance to the new post-closure regulations. [See August 29, 1989 entry.] Mr. Gefell believed that the GDC Landfill would need to comply with a number of minimum hydrogeological requirements before being granted any variance. A portion of Mr. Gefell's comments are noted, verbatim, below:

1. *They [GDC] must secure a source of capping material that meets IDEM hydraulic (recompacted) and compaction property requirements and provide proof of money set aside to complete the capping, contouring, and drainage.*
2. *GDC must install a groundwater monitoring well system (mws) that meets IDEM installation specifications and adequately defines groundwater contamination by said facility. According to 329 IAC 2-16-1, all existing sanitary landfills must have a monitoring well system that meets the requirements of the Commissioner on or before [September 1, 1989]. We would advise the Commissioner that the minimum four [4] wells (one [1] upgradient and three [3] downgradient) could not adequately define groundwater contamination by the 62 acre GDC Landfill. This site needs more than the minimum number of wells because of the size of the source area (62 acres) and the compounded problem of radial groundwater flow probably emanating and dispersing contaminants in all directions from the mounded landfill. This site needs a **minimum** (and we stress minimum) of ten [10] monitoring locations; nine [9] with nested two-well clusters and one [1] groundwater table piezometer. Each cluster would have a shallow screened well to detect 'floaters' contaminants on the groundwater table and a deeper screened well to detect 'sinkers' in the uppermost aquifer, in this case the upper 30 to 40 feet of surficial sandy beach and dune soil. A minimum of seven [7] of these well clusters should be around the mounded landfill, concentrating on the southern flanks close to the Grand Calumet River. Two [2] clusters would be positioned upgradient from the landfill (presumably north but must be accurately determined by GDC before wells are installed), in a line perpendicular to the direction of groundwater flow (probably north to south, but must be determined by GDC). These clusters should be set several hundred feet apart beyond the zone of groundwater contamination from the GDC Landfill (greater than 600 ft if possible). The upgradient wells will be located on off-site property, probably along the Indiana Toll Road Connector or other State property. Mr. John Crist of the Indiana Toll Road said it was likely the wells could be located along the Connector right-of-way. Groundwater samples from these upgradient wells should adequately characterize the 'background' water chemistry. The*

groundwater table piezometer would form a triangle with the two [2] upgradient clusters to keep track of flow direction variations. The piezometer is not a sampling well.

GDC would be skirting the required hydrogeologic study and groundwater assessment because of time and money restrictions. Consequently, for these and other pre-eminent reasons, we cannot guarantee that ten [10] wells would be adequate but we can say that it would be very difficult for GDC to prove to us that anything less is adequate. However, depending on their financial status, we may bargain for two [2] upgradient well clusters and five [5] clusters around the mounded landfill.

December 14, 1989

A Landfill Erosion and Sedimentation Review Worksheet was compiled by Mr. Molchan for the GDC Landfill. Accompanying Mr. Molchan were Messrs. Nanney and Schafer. The Worksheet noted areas of erosion and off-site sedimentation. The Worksheet was issued to Mr. Hagen by Mr. Olsterholz.

January 23, 1990

An inspection of the GDC Landfill was conducted at 12:00pm by Mr. Schafer. Mr. Schafer noted three (3) violations, including faulty daily cover (329 IAC 2-14-12), lack of final cover (329 IAC 2-14-19), and on-site leachate (329 IAC 2-14-21).

February 20, 1990

An inspection of the GDC Landfill was conducted at 10:25am by Mr. Schafer. Mr. Schafer noted three (3) violations, including faulty daily cover (329 IAC 2-14-12), lack of final cover (329 IAC 2-14-19), and on-site leachate (329 IAC 2-14-21).

April 2, 1990

An inspection of the GDC Landfill was conducted at 12:45am by Messrs. Schafer and Miller. Mr. Schafer noted four (4) violations, including faulty daily cover (329 IAC 2-14-12), lack of final cover (329 IAC 2-14-19), on-site leachate (329 IAC 2-14-21), and poor grading and stabilization (329 IAC 2-14-18).

May 24, 1990

Four (4) water samples were obtained from the monitoring wells at the GDC Landfill.

June 8, 1990

Mr. Warner conducted an inspection of the GDC Landfill. Mr. Hagen was not present during the inspection. Mr. Warner was able to speak with Mr. Hagen via telephone after the inspection. He stated that he was buying clay and initiating the construction of a cap for the landfill. Also, Mr. Hagen noted that a lien was placed on the property due to nonpayment for the clay.

August 1, 1990

A complaint inspection of the GDC Landfill was performed at 6:30pm by Mr. Michael Kuss, Office of Water Management. Mr. Kuss noted that the GDC Landfill was rated as unacceptable. Water was observed being pumped from a large pond located on the far north side of the via a flexible hose into a spillway leading to the Grand Calumet River. Mr. Bud Martin, the GDC Landfill night watchman, appeared to answer Mr. Kuss' questions in an evasive manner and also managed to turn off the pump that was transferring water from the large pond into the Grand Calumet River. *[Find this inspection report.]*

Three (3) water samples were obtained from the monitoring wells at the GDC Landfill.

October 18, 1990

The following is a copy of Emergency Order, Cause No. B-1357, signed by Commissioner Kathy Prosser on October 16, 1990, and issued to GDC on October 18, 1990. This Emergency Order was based upon an inspection of the GDC Landfill on August 1, 1990, by Office of Water Management inspector Mr. Michael Kuss.

STATE OF INDIANA)		BEFORE THE INDIANA DEPARTMENT
)	SS:	OF ENVIRONMENTAL MANAGEMENT
COUNTY OF MARION)		
COMMISSIONER OF THE DEPARTMENT)		
OF ENVIRONMENTAL MANAGEMENT,)		
)		
Complainant,)		
)		CAUSE NO. B-1357
v.)		
)		
GARY DEVELOPMENT COMPANY, INC.,)		
)		
Respondent.)		

EMERGENCY ORDER OF THE COMMISSIONER

TO: Mr. William M. Nanini, President
Gary Development Company, Inc.
2727 West Club Drive
Tuscon, Arizona 87541

C.T. Corporation, Resident Agent
Gary Development Company, Inc.
1 North Capitol
Indianapolis, Indiana 46204

Follows is the Emergency Order of the Commissioner of the Department of Environmental Management issued against Gary Development Company, Inc. for violation of the Water Pollution Control Act. This Emergency Order is issued pursuant to IC 13-7 and IC 4-21.5-4 and is based on an investigation which revealed a threat to the environment and potential health condition. During this investigation, it was determined that Gary Development Company, Inc. was in violation of 327 IAC 5. This rule states, in part, that a point source discharge of pollutants to waters of the State without a valid NPDES Permit is prohibited. Such a discharge is also a violation of IC 13-1-3, and the Environmental Management Act (IC 13-7).

I. FINDINGS OF FACT

1. Complainant is the Commissioner of the Indiana Department of Environmental Management (also referred to as Commissioner).
2. Complainant has jurisdiction over the Respondent and the subject matter of this action.
3. Respondent, Gary Development Company, Inc. owns a sanitary landfill located in Gary, Indiana.
4. Complainant conducted an inspection of Respondent's facility on August 1, 1990. The inspection revealed that Respondent was discharging leachate water from their facility to receiving waters named the Grand Calumet River.
5. Respondent does not have an NPDES Permit that authorizes point source discharges from the above named facility.
6. Complainant alleges that as a result of untreated leachate flowing from Respondent's sanitary landfill, a threat to the aquatic environment of the Grand Calumet River and human health exists.

II. ORDER

WHEREFORE, it is now ORDERED that upon receipt of this Emergency Order, Respondent shall:

1. Respondent shall immediately cease the discharge of leachate into waters of the State.
2. Respondent shall apply for an NPDES Permit within sixty (60) days of the effective date of this Order.
3. This Emergency Order is effective upon issuance, except that:
 - a. A party affected by this Emergency Order may request a hearing under IC 4-21.5-4-4 by submitting a written request to the Commissioner at the aforementioned address.
 - b. Upon a request by a party for a hearing, the agency shall, as quickly as practicable, set the matter for an evidentiary hearing and an administrative law judge shall determine whether this Emergency Order should be voided, terminated, modified, stayed, or continued.
 - c. This Emergency Order expires ninety (90) days from the date of issuance and is subject to renewal under IC 4-21.5-4-5.

Dated at Indianapolis, Indiana, this 16th day of October.

November 9, 1990

Three (3) samples were obtained from the monitoring wells at the GDC Landfill.

December 13, 1990

An inspection of the GDC Landfill was conducted at 1:30pm by Mr. Schafer. Mr. Schafer noted three (3) violations, including faulty daily cover (329 IAC 2-14-12), lack of final cover (329 IAC 2-14-19), and on-site leachate (329 IAC 2-14-21). Mr. Schafer noted that the entrance road had been cut for the purpose of installing a culvert, thus allowing the water ponded between the GDC Landfill and Vulcan to be drained, presumably, into the Grand Calumet River.

January 22, 1991

A subpoena was issued to Mr. Palin from Judge Anita W. Ruppert to appear and testify on January 29, 1991 at 11:00am regarding the Emergency Order, Cause No. B-1357 (90-W-J-428), issued to GDC on October 18, 1990.

March 7, 1991

An inspection was conducted at the GDC Landfill.

April 16, 1991

A follow-up inspection of the GDC Landfill was performed by Mr. Kuss. [*Find more information on this inspection.*]

April 26, 1991

**NOTICE OF FILING OF RECOMMENDED FINDINGS OF FACT/CONCLUSIONS
OF LAW AND ORDER OF THE ADMINISTRATIVE LAW JUDGE**

You are hereby notified that on the 26 day of April, 1991, I, as Presiding Officer in the above cause, have presented to and have filed with the Technical Secretary of the Water Pollution Control Board the complete record of the proceedings heretofore held before me on the above cause including Recommended Findings of Fact and Conclusions of Law, other than the transcript of the oral testimony, together with my Recommended Order.

A copy of said Recommended Findings of Fact and Conclusions of Law and Recommended Order is enclosed and made a part of this notice.

You are further notified, as provided by IC 4-21.5-3-29(d)(2) that any interested and affected person may, within fifteen (15) days after receipt of notice file with the Technical Secretary of the Water Pollution Control Board, 5th Floor, Department of Environmental Management, 105 South Meridian Street, Indianapolis, Indiana 46225, objections to the entry of such Order.

Copies of such objections shall also be filed with the Presiding Officer and with all other parties or counsel of record.

If objections are filed, responsive pleadings shall be filed with the Technical Secretary by all other parties within ten (10) days of receipt of objections, with copies to the Presiding Officer and with all other parties or counsel of record.

Dated at Indianapolis, Indiana, this 26 day of April, 1991.

May 13, 1991

**IDEM's OBJECTIONS TO THE RECOMMENDED FINDINGS OF FACT,
CONCLUSIONS OF LAW AND ORDER OF THE ADMINISTRATIVE LAW JUDGE**

Comes now the Complainant, by counsel, and objects to the following RECOMMENDED FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER OF THE ADMINISTRATIVE LAW JUDGE filed in this cause on April 26, 1991:

1. Findings of Fact numbered 26 where the Administrative Law Judge (ALJ) found that the report of soil borings performed by ATEC Associates demonstrated the permeability to be within required parameters.
2. Conclusion of Law numbered 1 to the extent that the ALJ found that Respondent invoked the jurisdiction of the Solid Waste Management Board in this proceeding.
3. Conclusion of Law numbered 6.
4. Conclusion of Law numbered 8 where the ALJ found that the soil boring report submitted by Respondent in 1985 demonstrate an acceptable level of impermeability according to the terms of the Agreed Order in Cause No. N-52.
5. Conclusion of Law numbered 9 where the ALJ found that Respondent is entitled to a hearing on its Petition for Variance.
6. Order numbered 3 where the ALJ found that Respondent may at any time commence construction of the remaining portion of the clay perimeter in accordance with the terms of the Agreed Order in Cause No. N-53.
7. Order numbered 4 where the ALJ granted Respondent's request for a hearing and assigned the matter as Cause No. 91-S-J-488 entitled "In the Matter of: Request for Variance from Closure and Post-Closure Rules, Gary Development Company, Inc."

Each Finding of Fact, Conclusion of Law, or Order challenged above violates one or more of the following legal requirements in that it is:

- (A) Arbitrary, capricious, an abuse of discretion, or contrary to law;
- (B) Contrary to constitutional right, power, privilege, and immunity;
- (C) In excess of statutory jurisdiction, authority, or limitations;
- (D) Without observance of procedure required by law; or
- (E) Unsupported by substantial evidence.

WHEREFORE, Complainant requests the Water Pollution Control Board to modify the Recommended Findings of Fact, Conclusions of Law and Order of the Administrative Law Judge by deleting therefrom those paragraphs which have been set forth and challenged above.

Respectfully submitted:

CERTIFICATE OF SERVICE

I hereby certify that a copy of these objections was served upon Counsel for the Respondent by U.S. first class mail this 13th day of May 1991, addressed as follows:

Warren D. Krebs, Esq.
1600 Market Tower
Ten West Market Street
Indianapolis, IN 46204-2970

A copy of these objections has also been served upon each of the following offices within IDEM: Office of Hearings; Office of Water Management; and Office of Solid and Hazardous Waste Management.

October XX, 1991

PETITION FOR HEARING
ON ISSUANCE OF EMERGENCY ORDER

The Respondent Gary Development Company, Inc. (hereinafter called "GDC"), pursuant to Indiana Code 13-7-12-1(d) petitions for and requests a hearing under Indiana Code 4-21.5-4-4 regarding the Commissioner's Emergency Order with dates of October 16 and October 18, 1990. GDC's appeal includes, but is not limited to, contesting the following issues in the Emergency Order:

1. The Complainant did not observe leachate discharging from GDC's facility into the Grand Calumet River on August 1, 1990.
2. Any surface water alleged to be discharging from GDC's facility does not constitute a "point source discharge of pollutants to waters of the state."
3. The surface waters on GDC's site do not constitute leachate, and the Complainant on August 1, 1990, never collected and analyzed surface waters to determine whether such on-site water contained materials removed from solid waste necessary to classify it as "leachate."
4. Complainant on August 1, 1990, did not sample and analyze the water of the State of Indiana known as the Grand Calumet River near GDC's facility, and thus, there exists no threat of pollution in the mixing zone to the aquatic environment of the Grand Calumet River or to human health.

WHEREFORE, the Respondent Gary Development Company, Inc., petitions for a hearing regarding the Emergency Order of the Commissioner and regarding all issues raised in this Petition, and requests that the Emergency Order be voided.

December XX, 1991

**RECOMMENDED FINDINGS OF FACT, CONCLUSION OF LAW
AND OTHER OF THE ADMINISTRATIVE LAW JUDGE**

1. The Commissioner of the Indiana Department of Environmental Management (IDEM) is the Complainant in this cause and has jurisdiction over the Respondent and the subject matter of this _____ also has the legal authority to issue emergency _____.
2. The Respondent is Gary Development _____ (Gary) and owns a sanitary landfill located in Gary, Indiana.
3. On August 1, 1990, an inspector with the _____ conducted an on-site investigation of Gary's landfill property in _____ allegations that water was being discharged from the landfill property _____ and Calumet River.
4. IDEM's inspector observed a 2-5 acre pond _____ far north side of Gary's property whose elevations was approximately _____ feet below that of the landfill.
5. A watchman employed by Gary advised _____ that recent heavy rains had made it necessary to discharge _____ water _____ to bring in truckloads of clay in order to prevent _____ of the landfill from the washing away of topsoil.
6. IDEM's inspector heard a pump running and observed water being pumped from the pond via a flexible hose which ran south into a 4" PVC pipe which was buried for most of its length. The PVC pipe emptied into a spillway which allowed the water to flow to a small ditch along railroad tracks and the ditch in turn entered the Grand Calumet River.
7. Gary's watchman refused to provide any further details about the discharge and ran to turn off the pump while IDEM's inspector followed the discharge line the other way.
8. As the pump was being shut off, the flow of water from the discharge end of the pipe was reduced to a trickle and the inspector observed a large volume of ponded

water just below the end of the discharge pipe and a burned out area of vegetation further on towards the ditch.

9. The inspector did not take any samples of either the pond or the discharged water and none have since been taken.
10. Gary does not have a NPDES permit for discharging into the Grand Calumet River.
11. On October 1, 1990, the IDEM issued an Emergency Order of the Commissioner (Order) to Gary based, in whole, on the August 1, 1990 inspection report.
12. The Order alleged that Gary was discharging leachate water from their facility to the Grand Calumet River without the benefit of a NPDES permit.
13. The Order also alleges that the discharge of untreated leachate threatens the aquatic environment of the Grand Calumet River and human health.
14. As a result of IDEM's findings, Gary was ordered to immediately cease the discharge of leachate into state waters and to apply for a NPDES permit within sixty (60) days of the Order.
15. Gary timely filed its appeal of the Order, thereby initiating this action.
16. On April 14, 1980, Gary entered into an Agreed Order in Cause No B-406, which the Stream Pollution Control Board approved on May 20, 1980. The Agreed Order required Gary to cease discharge of water from its landfill to the Grand Calumet River or other waters of the state except in conformity with a NPDES permit.
17. The April 14, 1980, Agreed Order operated as a provisional operating permit and required Gary to apply for a renewal no later than ninety (90) days prior to the expiration date of the Agreed Order.
18. The Indiana Environmental Management Board (IEMB) received Gary's application for renewal on November 17, 1980. On February 16, 1982, IEMB granted Gary a renewal of Operating Permit No. 45-2, with nine conditions attached. Condition No. 5 prohibited Gary from discharging water from the site to the Grand Calumet River or other waters for the state, except in conformity with an approved NPDES permit.
19. Gary filed a petition for hearing, contesting the imposition of the nine conditions, including Condition No. 5.

20. Thereafter, Gary and IEMB reached a settlement on Gary's appeal under Cause No. N-53, and their Settlement Agreement and Recommended Agreed Order was approved and adopted by the Indiana Environmental Management Board on February 18, 1983.
21. Paragraph No. 3 of the Agreed Order deleted in its entirety the contested Condition No. 5, thereby eliminating the requirement for a NPDES permit.
22. The Agreed Order in Cause No. N-53 provided that Gary's operating permit should last for a period of two (2) years from its effective date of March 1, 1983.
23. Prior to the end of this period, Gary submitted an application for renewal of its operating permit, but no decision has been issued thereon.
24. The 2-5 acre pond from which water was being discharged on August 1, 1990, is located in a portion of the landfill which remains unfilled and below the approved site elevation.
25. This northern section remains unfilled because under the terms of the Agreed Order in Cause No. N-53, Gary, prior to filling it, was required to take four (4) soil borings from the site's west wall. If these test results showed the permeability of the clay wall to be 5.0×10^{-6} centimeters per second or less, then construction of the remaining portion of the clay perimeter walls could proceed and filling commence.
26. In November 1985, Gary submitted to IDEM a report of soil borings performed by ATEC Associates, the results of which demonstrated the permeability to be within the parameters of the Agreed Order. However, IDEM has not yet responded to the submission of this report.
27. The difference in the elevations of Gary's filled and unfilled sites contributes significantly to the ponding of water in the unfilled area.
28. On August 29, 1989, Gary filed with the IDEM a Notice of Suspending Operations and a Petition for Variance under IC 13-7-7-6. The notice also advised the IDEM of its failure to respond to both the 1985 soil boring results and the 1985 permit renewal application. In addition, Gary informed IDEM of the continued existence of the unfilled area which remains below the approved site elevation.
29. On December 11, 1989, Gary filed a Request for Hearing on its Petition for Variance. As with the soil boring report and operating permit renewal application, IDEM has never ruled on Gary's request for a hearing.

CONCLUSIONS OF LAW

1. Gary has invoked the jurisdiction of the Solid Waste Management Board, as well as the Water Pollution Control Board, through its affirmative defenses raised in this proceeding.
2. The February 18, 1983, Agreed Order in Cause No. N-53 is still in effect due to IDEM's failure to rule on Gary's operating permit renewal application.
3. 327 IAC 5-2-2 requires a NPDES permit for "...any discharge of pollutants into water of the state as a point source discharge..."
4. There is not sufficient evidence to support IDEM's contention that the water discharge contained leachate.
5. However, the proximity of the pond to land-filled areas, plus the burned-out vegetation near the mouth of the pipe, supports the inference that the discharge water contains one or more pollutants.
6. Since the terms of the Agreed Order under Cause No. N-53 explicitly deleted the requirement for a NPDES permit, no chemical analysis or other observations sufficiently support IDEM's conclusion that the discharged water contained leachate, the IDEM has unreasonably delayed ruling on Gary's operating permit renewal application, the Emergency Order dated October 18, 1990, was not an appropriate vehicle for resolution of the discharge problem.
7. Nonetheless, there is sufficient evidence to support IDEM's position that Gary must obtain an NPDES permit for its point source discharge.
8. The soil boring report submitted by Gary in 1985 demonstrates an acceptable level of impermeability according to the terms contained in the Cause No. N-53 Agreed Order.
9. Gary is entitled to a hearing on its Petition for Variance, as it previously requested on December 11, 1989.

ORDER

1. Gary shall immediately cease discharging any water off-site until it obtains a valid NPDES permit.

2. IDEM shall rule on Gary's NPDES application within sixty (60) days of receiving it.
3. Gary may at any time commence construction of the remaining portion of the clay perimeter in accordance with the terms of the Agreed Order in Cause No. N-53.
4. Gary's Request for Hearing submitted on December 11, 1989, is granted, the same having been assigned Cause No. 91-S-J-488 and entitled "In the Matter of: Request for Variance From Closure and Post-Closure Rules, Gary Development Company, Inc." Anita W. Ruppert shall be the Presiding Administrative Law Judge assigned to said cause.

December 17, 1991

A file memorandum was issued by Mr. John P. Naddy, Site Investigation Section, Office of Environmental Response regarding a review of the Focused Site Inspection Prioritization Review conducted by Ecology & Environment, Inc. Mr. Naddy recommended that the site merits further remedial action and suggested a low priority site inspection.

February 4, 1992

Mr. Thomas W. Mateer, Acting Chief, Superfund Program Management Branch, EPA Region V, issued CERCLA 104(e) and RCRA 3007 Request for Information Letters to the following entities:

- | | | | |
|----|------------------------------|------------------------|-------------------------------|
| 1. | Mr. Franks, Inc. | 201 West 155th Street | South Holland, Illinois 60473 |
| 2. | Strand Trucking, Inc. | 13642 Kenton | Crestwood, Illinois 60445 |
| 3. | CWM of Indiana | 4636 Adams Center Road | Fort Wayne, Indiana 46806 |
| 4. | Ashland Chemical | 6428 Joliet Road | Countryside, Illinois 60525 |
| 5. | Kankakee Industrial Disposal | 1360-90 East Locust | Kankakee, Illinois 60901 |
| 6. | Rozema Industrial Wastes | 2900 Peachridge | Walfer, Michigan 49504 |
| 7. | ABC Services, Inc. | 5910 49th Street | Kenosha, Wisconsin 53142 |

February 18, 1992

An inspection was conducted at the GDC Landfill by Messrs. Jack Brunner and Rick Hersemann and Ms. Judy Wagner of PRC Environmental Management, Inc. Numerous violations were identified.

April 9, 1992

Mr. Joe Kawecki, Superfund Program Management Branch, EPA Region V, inspected the GDC Landfill. He was accompanied by another unidentified inspector. Mr. Kawecki videotaped what he thought to be drums located at the north end of the GDC Landfill.

April 30, 1992

Mr. Schafer telephoned Mr. Kawecki to discuss the alleged burial of drums at the GDC Landfill. Earlier, Mr. Kawecki videotaped what he thought to be several drums, in the process of being buried, located at the north end of the GDC Landfill. Mr. Kawecki noted that his inspection of the GDC Landfill on April 9, 1992, identified five (5) empty drums that once held hydraulic oil for use in the backhoe.

July 31, 1992

Mr. Schafer inspected the GDC Landfill. Specifically, Mr. Schafer was evaluating the complaint by Mr. Hagen that Vulcan Materials, now known as AMG Resources, Inc. ("AMG"), was dumping waste that was contaminating their groundwater monitoring wells. Mr. Schafer walked the property line between the GDC Landfill and AMG and identified piles of a reddish steel scale and miscellaneous metal cans. The scrap metal was in contact with the standing water trapped between the two properties. Mr. Schafer noted that the water probably had some degree of contamination.

February 12, 1993

A Motion for Continuance was filed by IDEM in the Matter of Objections to the Denial of Closure Rules Variance for the GDC Landfill, Cause No. 92-S-J-744.

August 19, 1993

ORDER REQUESTING STATUS REPORT

On April 26th, 1991, a Recommended Order was issued in the above-captioned cause. As I have yet to receive a Final Order disposing of this matter, the following order is being issued. A copy of the final order disposing of this matter will substitute for the requested Status Report.

You are hereby ordered to file with the Presiding Officer, on or before December 1, 1993, a Status Report containing the following information:

1. Appearances of counsel (if not already filed).
2. A statement, subject to later amendment, sufficiently specific to apprise the Presiding Officer of the basic issues of fact and law of the cause of action.

3. Any presently contemplated or pending preliminary motions.
4. A statement as to all discovery which has been undertaken, including dates filed and dates of response.
5. A statement as to all discovery which is contemplated, and a tentative schedule therefore.
6. The status of settlement negotiations, including:
 - a. dates of previous settlement negotiations,
 - b. agreed facts or issues of law,
 - c. a statement as to all existing disputed issues of fact and law,
 - d. an assessment of the possibilities of settlement including a time frame for continued negotiations.
7. A proposed timetable for further proceedings in the case.

The parties are directed to confer with respect to all items listed above and to submit a joint statement thereto. If agreement cannot be reached on any time, separate statements may be submitted.

Dated this 19th day of August 1993.

March 23, 1994

FINAL ORDER OF THE WATER POLLUTION CONTROL BOARD

TO:

On March 9, 1994, the Water Pollution Control Board entered an Order modifying the Recommended Findings of Fact, Conclusions of Law and Order of the Administrative Law Judge, issued on April 26, 1991. The following Findings of Facts, Conclusions of Law, and Order, is hereby entered as the Final Order of the Water Pollution Control Board in the above captioned cause.

FINDINGS OF FACT

1. The Commissioner of the Indiana Department of Environmental Management (IDEM) is the Complainant in this cause and has jurisdiction over the Respondent

and the subject matter of this action. The IDEM also has the legal authority to issue emergency orders under IC 4-21.5-4.

2. The Respondent is Gary Development Company, Inc. (Gary) and owns a sanitary landfill located in Gary, Indiana.
3. On August 1, 1990, an inspector with the IDEM conducted an on-site investigation of Gary's Landfill property in response to allegations that water was being discharged from the landfill property to the Grand Calumet River.
4. IDEM's inspector observed a 2-5 acre pond on the far north side of Gary's property whose elevation was approximately 20 to 30 feet below that of the landfill.
5. A watchman employed by Gary advised the inspector that recent heavy rains had made it necessary to discharge excess water and to bring in truckloads of clay in order to prevent exposure of the landfill from the washing away of topsoil.
6. IDEM's inspector heard a pump running and observed water being pumped from the pond via a flexible hose which ran south into a 4" PVC pipe which was buried for most of its length. The PVC pipe emptied into a spillway which allowed the water to flow to a small ditch along railroad tracks and the ditch in turn entered the Grant Calumet River.
7. Gary's watchman refused to provide any further details about the discharge and ran to turn off the pump while IDEM's inspector followed the discharge line the other way.
8. As the pump was being shut off, the flow of water from the discharge end of the pipe was reduced to a trickle and the inspector observed a large volume of ponded water just below the end of the discharge pipe and a burned out area of vegetation further on towards the ditch.
9. The inspector did not take any samples of either the pond or the discharge water and none have since been taken.
10. Gary does not have a NPDES permit for discharging into the Grand Calumet River.
11. On October 18, 1990, the IDEM issued an Emergency Order of the Commissioner (Order) to Gary based, in whole, on August 1, 1990, inspection report.

12. The Order alleged that Gary was discharging leachate water from their facility to the Grand Calumet River without the benefit of a NPDES permit.
13. The Order also alleges that the discharge of untreated leachate threatens the aquatic environment of the Grand Calumet River and human health
14. As a result of IDEM's findings, Gary was ordered to immediately cease the discharge of leachate into state water and to apply for a NPDES permit within sixty (60) days of the Order.
15. Gary timely filed its appeal of the Order, thereby initiating this action.
16. On April 14, 1980, Gary entered into an Agreed Order in Cause No. B-406, which the Stream Pollution Control Board approved on May 20, 1980. The Agreed Order required Gary to cease discharge of water from its landfill to the Grand Calumet River or other waters of the state except in conformity with a NPDES permit.
17. The April 14, 1980, Agreed Order operated as a provisional operating permit and required Gary to apply for a renewal no later than ninety (90) days prior to the expiration date of the Agreed Order.
18. The Indiana Environmental Management Board (IEMB) received Gary's application for renewal on November 17, 1980. On February 16, 1992, IEMB granted Gary a Renewal of Operating Permit No. 45-2, with nine conditions attached. Condition No. 5 prohibited Gary from discharging water from the site to the Grand Calumet River or other waters of the state, except in conformity with an approved NPDES permit.
19. Gary filed a petition for hearing, contesting the imposition of the nine conditions, including Condition No. 5,
20. Thereafter, Gary and IEMB reached a settlement on Gary's appeal under Cause No. N-53, and their Settlement Agreement and Recommended Agreed Order was approved and adopted by the Indiana Environmental Management Board on February 18, 1983.
21. Paragraph No. 3 of this Agreed Order deleted in its entirety the contested Condition No. 5, thereby eliminating the requirement for a NPDES permit.
22. The Agreed Order in Cause No. N-53 provided that Gary's operating permit should last for a period of two years from its effective date of March 1, 1983.

23. Prior to the end of this period, Gary submitted an application for renewal of its operating permit, but no decision has been issued thereon.
24. The 2-5 acre pond from which water was being discharged on August 1, 1990, is located in a portion of the landfill which remains unfilled and below the approved site elevation.
25. This northern section remains unfilled because under the terms of the Agreed Order in Cause No. N-53, Gary, prior to filling it, was required to take four soil borings from the site's west wall. If these test results showed the permeability of the clay wall to be 5.0×10^{-6} centimeters per second or less, then construction of the remaining portion of the clay perimeter walls could proceed and filling commence.
26. The difference in the elevations of Gary's filled and unfilled sites contributes significantly to the ponding of water in the unfilled area.
27. On August 29, 1989, Gary filed with the IDEM a Notice of Suspending Operations and Petition for Variance under IC 13-7-7-6. The notice also advised the IDEM of its failure to respond to both the 1985 soil boring results and the 1985 permit renewal application. In addition, Gary informed IDEM of the continued existence of the unfilled area which remains below the approved site elevation.
28. On December 11, 1989, Gary filed a Request for Hearing on its Petition for Variance. As with the soil boring report and operating permit renewal application, IDEM has never filed on Gary's request for a hearing.

CONCLUSIONS OF LAW

1. The February 18, 1983, Agreed Order, in Cause No. N-53 is still in effect due to IDEM's failure to rule on Gary's operating permit renewal application.
2. 327 IAC 5-2-2 requires a NPDES permit for "...any discharge of pollutants into waters of the state as a point source discharge..."
3. There is not sufficient evidence to support IDEM's contention that the water discharged contained leachate.
4. However, the proximity of the pond to land-filled areas, plus the burned-out vegetation near the mouth of the pipe, supports the inference that the discharged water contains one or more pollutants.

5. Since the terms of the Agreed Order under Cause No. N-53 explicitly deleted the requirements for a NPDES permit, no chemical analysis of other observations sufficiently support IDEM's conclusion that the discharge water contained leachate, the Emergency Order dated October 18, 1990, was not an appropriate vehicle for resolution of the discharge problem.
6. Nonetheless, there is sufficient evidence to support IDEM's position that Gary must obtain an NPDES permit for its point source discharge

ORDER

1. Gary shall immediately cease discharge any water off-site until it obtains a valid NPDES permit.
2. IDEM shall rule on Gary's NPDES application within sixty (60) days of receiving it.

The Modified Findings of Facts, Conclusions of Law, and Order are hereby approved and entered as the Final Order of the Water Pollution Control Board. Pursuant to IC 4-21.5-5-5, a petition for judicial review is timely only if it is filed within thirty (30) days after the date that notice of the agency action, that is the subject of the petition for judicial review, was served.

Dated at Indianapolis, Indiana this 23rd day of March 1994.

October 19, 1994

A letter was issued to Mr. Michael G. Lopez, President, Actin, Inc., P.O. Box 518, 1102 East Columbia Drive, East Chicago, Indiana, 46312, from Mr. Wersan regarding an earlier request to dispose of rubber waste from a recent fire at the Rubber Materials Handling Company at the GDC Landfill. The letter noted that the GDC Landfill was closed and would need to re-open in order to accept such wastes.

May 19, 1995

A letter was issued to Mr. Lopez from Mr. Wersan regarding an earlier request to dispose of tire chips as an alternative daily cover at the GDC Landfill. The letter stated that shredded tires were considered a solid waste and that it must be managed as such if accepted for land disposal.



GEORGIA-PACIFIC CORPORATION

INDUSTRIAL TISSUE DIVISION

SECOND PLACE & WAITE STREET • GARY, INDIANA 48401

TELEPHONE: 885-8183 • AREA CODE: 219.

February 19, 1969

Mr. B.A. Poole, Technical Secretary
State of Indiana
Stream Pollution Control Board
1330 West Michigan Street
Indianapolis, Indiana

Dear Mr. Poole:

This is to advise you that because of our difficulties in obtaining delivery of some of our machinery for our pollution abatement program, we have revised our original plans for disposal of the sludge. Originally we had intended making a small holding pond on an on-site location of our mill property. While this would have been a solution, the high cost of dredging this pond and hauling to another dump would have been prohibitive. We have, therefore, purchased an additional piece of property some 3,000 ft. from our mill and will build two (2) seven (7) acre holding ponds on this property and pump our sludge to these ponds.

Enclosed you will find a drawing outlining our proposed pipelines and the proximity of the land above mentioned in regard to our mill.

We are now in the final stages of obtaining the easements for crossing properties located between the mill and this parcel of land, and should, therefore, start the work of laying these pipes in the next few days.

If any questions should arise, please advise me at your earliest.

Sincerely,

K. A. Summerlin
Resident Manager

KAS:bm
encl.

Attachment 13.1



NORTHERN LABORATORIES, INC.

RECEIVED

MAR 3 1980

ENERGY & ENVIRONMENT

ENVIRONMENTAL TESTING SERVICES
AIR & WATER POLLUTION-SOLID WASTES

SAMPLING - ANALYSIS - CONSULTING

Telephone (219) 464-2389

158 Napoleon
Valparaiso, Indiana 46383

LABORATORY REPORT

CLIENT Georgia Pacific Corporation
Attn: Mr. Ken Renshaw
ADDRESS P.O. Box 4236, 2nd Place & Waite Street
DATE OF COLLECTION January 20, 1981 (0081)

DATE February 20, 1981
PHONE 882-1640

PARAMETER

Toluene

Benzene

OLD Sludge Bed

<0.5 µg/g

<0.5 µg/g

NEW Sludge Bed

<0.5 µg/g

<0.5 µg/g

FRESH Sludge

<0.5 µg/g

<0.5 µg/g

*Taken about
6" deep.*

*Taken from
sludge line.*

Approved By

Diane L. Harper
Manager of Operations

*tlb
de*

SOURCE OF SAMPLE(S) _____

KEY:

SAMPLER _____

HAZLETT & ASSOCIATES
Environmental Consultants

March 15, 1983

Mr. George Oliver
Division of Land Pollution Control
Indiana State Board of Health
1330 Michigan Ave.
Indianapolis, IN 46206

Ref: City of East Chicago

Dear Mr. Oliver,

Several times over the past months it has been suggested that the burnt cans and debris piled in the area between the railroad and the East Chicago incinerator property be cleaned up.

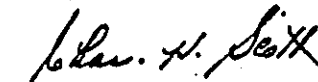
Attached is a plat showing the area.

We would propose to use Georgia Pacific paper sludge, East Chicago waste water treatment sludges and work this into the debris. It is suggested that the grading and leveling procedure would drain the area to the Southwest. Finally, a layer of East Chicago sludge be disk into the Georgia Pacific sludges with a farm tractor, planted and lightly rolled to assure germination.

Laboratory analysis of both sludges are attached and made a part of this request.

With your authority and approval this could be accomplished in thirty days. Your immediate attention and response is requested.

Very truly yours,



Chas. H. Scott

cc: Mr. Dan McArdle
Mr. Chet Adamczyk

CHS/ds

46231 (317) 243-8304

IN021

SOURCES Hazlett & Associates
PO Box 519
East Chicago, Illinois 46312
Attn: Charlie Scott

LL TO:

EMS SAMPLE # 31778

P.O. # _____ SAMPLE TYPE GRAB COMPOSITE

WASTEWATER _____

DATE SAMPLED _____

SLUDGE _____

COLLECTED BY _____

OIL _____

REMARKS _____

LEACHATE _____

OTHER _____

ND=Not detected at level indicated

PARAMETER	RESULTS	DATE ANALYZED	ANALYST	METHOD OF ANALYSIS
<u>#31778 - Lagoon Sludge</u>				
PCB	ND @ 2 ug/gr	2-17	M. Smith	Gas Chromatography

*Rec'd
2-25-83
CL#260*

Run a blank

7901 West Morris Street
Indianapolis, Indiana 46231 (317) 243-8304
EPA Certification # IN021

EMS SAMPLE # 51002

P.O. # _____ SAMPLE TYPE GRAB COMPOSITE

SAMPLE SOURCES Hazlett & Associates
PO Box 519
East Chicago, Illinois 46312
Attn: Charlie Scott

WASTEWATER _____

DATE SAMPLED _____

SLUDGE _____

COLLECTED BY 5

BILL TO:

OIL _____

REMARKS _____

LEACHATE _____

RE: Georgia Pacific

OTHER _____

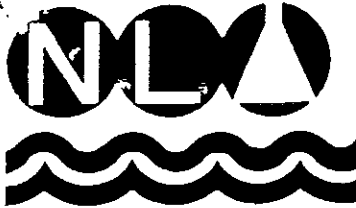
ND=Not detected at level indicated

PARAMETER	RESULTS	DATE ANALYZED	ANALYST	METHOD OF ANALYSIS
pH	5.1	2-17	M. Branam	Electrode method
Total Solids	100,271 mg/l	2-18	J. Pagnanelli	Gravimetric
<u>EP TOXICITY</u>				
Cadmium	ND @ .01 mg/l	2-21	C. Schneider	Atomic absorption
Chromium	ND @ .01 mg/l			
Lead	ND @ .1 mg/l			
Silver	ND @ .01 mg/l			
Barium	ND @ .1 mg/l			
Mercury	ND @ .0005 mg/l	2-21	C. Schneider	Flameless A A
Arsenic	ND @ .1 mg/l			
Selenium	ND @ .1 mg/l			

DATA REVIEWED BY: 

REPORT CC

File
2-25-83
CH



NORTHERN LABORATORIES
A Division of Coast to Coast Analytical Services
ENVIRONMENTAL CONSULTING AND TESTING

AIR, WATER POLLUTION & SOLID WASTES - SAMPLING - ANALYSIS - CONSULTING

Telephone (219) 464-2389 FAX: 219-462-2953

2400 Cumberland Drive
Valparaiso, Indiana 46383

LABORATORY REPORT

CLIENT Georgia Pacific Corp. DATE May 1, 1990
ATTENTION .. Mr. Ken Renshaw PHONE 1-882-1640
ADDRESS P.O. Box 4326, Gary, IN 46404 DATE OF SAMPLE RECEIPT
SAMPLE COLLECTED BY .. Northern Laboratories... March 16, 1990 (1462)

PARAMETER

RESULTS

Srew Press Sludge

Cyanide	38
pH	6.1
% Solids	43
% Ash	38
PCB	*
Arsenic	(0.5
Barium	14
Cadmium	(0.47
Chromium	7.7
Copper	30
Lead	1.2
Mercury	(0.10
Nickel	2.9
Silver	(0.47
Selenium	(0.5
Zinc	25

*See Attached

All results reported in mg/kg unless otherwise noted

djs/geogia2

Approved by

Adrienne Byrnes
Attachment 13.13

PCB Analysis
For
GEORGIA PACIFIC

Northern Laboratories
2400 Cumberland Drive
Valparaiso, Indiana 46383

Date Received: 3-16-90
Date Analyzed: 4-18-90
Date Extracted: 4-13-90
Analyst: CL

NLE Sample #: 1462
Customer ID: Sludge

Dilution Factor: 5:1
Sample Weight: 9.7g
Sample Matrix: Aqueous

EPA Method #: 8080
EPA Extraction Method: 3540

PARAMETER	RESULT	DET. LIMIT	UNITS
PCB 1016	ND	8.0	mg/kg
PCB 1221	ND	8.0	mg/kg
PCB 1232	ND	8.0	mg/kg
PCB 1242	ND	8.0	mg/kg
PCB 1248	ND	8.0	mg/kg
PCB 1254	ND	8.0	mg/kg
PCB 1260	ND	8.0	mg/kg

Hexabromobenzene (SS) ...

NR

Dibutyl Chlorendate (SS)...

NR

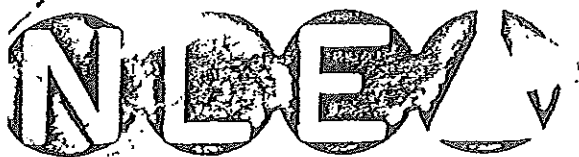
ND = Not Detected

NR = Not Reported; Surrogates diluted out

ADDITIONAL INFORMATION ON THIS DATA SET:
HBB

Surrogate Recovery on Hexane Blank = 95.%

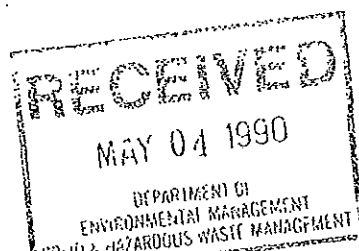
DBC
84.%



**NORTHERN LABORATORIES AND
ENGINEERING, INC.**

**ENVIRONMENTAL CONSULTING AND TESTING
R & WATER POLLUTION-SOLID WASTES**

SAMPLING - ANALYSIS - CONSULTING



Telephone (219) 464-2389 FAX: 219-462-2953

2400 Cumberland Drive
Valparaiso, Indiana 46383

LABORATORY REPORT

CLIENT Georgia Pacific DATE June 30, 1989
ATTENTION Mr. Ken Renshaw PHONE 1-882-1640
ADDRESS P.O. Box 4326, Gary, Indiana 46404 DATE OF SAMPLE RECEIPT
SAMPLE COLLECTED BY Northern Labs & Engineering June 2, 1989 (2198)

EP TOXICITY

Performed according to EPA SW-846.
All leachate results determined by
Method of Standard Additions

PARAMETER	RESULTS	EPA MAXIMUM CONCENTRATION
EP Leachate	Screw Press Sludge	
Arsenic	<0.020	5.0
Barium	0.255	100.0
Cadmium	0.009	1.0
Chromium	0.027	5.0
Lead	0.145	5.0
Mercury	<0.002	0.2
Selenium	<0.020	1.0
Silver	<0.002	5.0

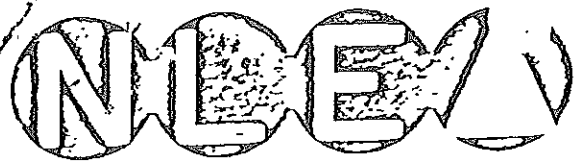
Leachate Conditions

% Solids (80 C): N/A
Initial pH: 4.5
Final pH: 4.4

Initial Sample Weight Used (Grams): 100
Volume Filterable Liquid (mLs): N/A
Grams Sample Extracted: N/A
Volume Acetic Acid per Gram Sample Extracted (mLs): 0.0

All results reported in mg/L unless otherwise noted

CONTINUED NEXT PAGE



NORTHERN LABORATORIES AND
ENGINEERING, INC.

ENVIRONMENTAL CONSULTING AND TESTING
AIR & WATER POLLUTION-SOLID WASTES SAMPLING ANALYSIS CONSULTING

Telephone (219) 464-2389 FAX: 219-462-2953

2400 Cumberland Drive
Valparaiso, Indiana 46383

LABORATORY REPORT

CLIENT Georgia Pacific DATE August 8, 1989
ATTENTION Mr. Ken Renshaw PHONE 1-882-1640
ADDRESS P.O. Box 4326, Gary, Indiana 46304 DATE OF SAMPLE RECEIPT
SAMPLE COLLECTED BY Northern Labs & Engineering June 2, 1989 (2198)

FINAL REPORT

TOTAL CONSTITUENTS ANALYSIS

Screw Press Sludge

PARAMETER	RESULTS
pH	4.5
% Solids	44
PCB	<2.0

All results reported in mg/kg unless otherwise noted

bav/2196

Approved by

Adrienne Byrnes

Manager of Analytical Chemistry Section



Georgia-Pacific Corporation

Second Place and Waite Street
P.O. Box 4326
Gary, Indiana 46404
Telephone (219) 882-1640.

JULY 20, 1982

MR. GEORGE OLIVER
INDIANA STATE BOARD OF HEALTH
DIVISION OF LAND POLLUTION CONTROL
1330 W. MICHIGAN ST.
INDIANAPOLIS, IN 46206

RE: OUR PHONE CONVERSATION ABOUT A WEEK AGO

DEAR GEORGE:

WE WOULD LIKE TO HAVE SOME OF THE SLUDGE REMOVED FROM TWO HOLDING BASINS.
WE WOULD LIKE TO KNOW WHAT LANDFILLS WE CAN HAUL IT TO.

THE AVERAGE SOLIDS IN ONE BASIN IS 24% AND IN THE OTHER 32%

THE CHEMICAL ANALYSIS OF THE TWO BASINS IS AS FOLLOWS:

<u>CONTAMINANT</u>	<u>1</u>	<u>2</u>
ARSENIC	< 0.06	< 0.08
BARIUM	0.3	< 1.0
CADIMUM	< 0.01	< 0.01
CHROMIUM	< 0.04	< 0.04
LEAD	0.2	0.1
MERCURY	< 0.001	< 0.001
SELENIUM	0	0.02
SILVER	0	0

WE ARE A PAPER MILL THAT MAKES INDUSTRIAL TOWELING. THE TYPE OF PAPER
TOWELS FOUND IN PUBLIC REST ROOMS. WE MAKE ABOUT 80 TONS PER DAY.
OUR FURNISH IS WASTE PAPER.

THE LIQUID INDUSTRIAL WASTE IS PROCESSED THROUGH A PRIMARY CLARIFIER.
THE SLUDGE FROM THE CLARIFIER IS PUMPED TO THE HOLDING BASINS, MENTIONED
ABOVE, TO THICKEN.

HOPE THIS IS THE INFORMATION YOU NEED. PLEASE CALL IF YOU HAVE ANY QUESTIONS

THANK YOU VERY MUCH.

SINCERELY,

Kenneth J. Renshaw
KENNETH J. RENSHAW
TECHNICAL DIRECTOR

Att achment 13.6

Georgia-Pacific



intracompany memo

to Jack Anderson location Atlanta
from Ken Renshaw location Gary, Indiana
subject Your Telephone Request for More History of the Settling Ponds. date August 19, 1988

NOTE: Only some of this material can be documented.

I. SLUDGE ORIGIN

All waste water from the mill is pumped to a clarifier. The settled material from this clarifier is sludge that now is pumped to the screw press but formerly was pumped to the holding ponds.

II. PAPER MILL

The product has been paper toweling with a very small percentage of napkins in the early 70's. The raw material is waste paper.

III. DEINKING PLANT

Raw Material: Several good grades of waste paper is used. They are:

1. Toweling waste from our papermill.
2. Kraft (grocery) bag.
3. Steel mill kraft interleaving.
4. Ledgers.
5. Flyleaf shavings (groundwood).

Only the ledgers and the groundwood need the ink washed out before they can be used. Almost all of the sludge settled in the clarifier is the result of the ink removal.

IV. SETTLING PONDS

1969: An open field was purchased by Georgia-Pacific and two seven acre holding ponds were built. Sludge from the primary clarifier was pumped to them.

1976/77: These sludge lagoons were cleaned. The southeast one (nearest the river) was cleaned completely and the other partially. The sludge was hauled to the Gary Development land-fill off Cline Avenue, Gary, Indiana by Industrial Disposal Corporation, East Chicago, Indiana.

1982: A backhoe was used to make a trough on both sides of the land area separating the two lagoons.

1983: In August permission was granted to haul sludge from the screw press to the "...Gary Airport exclusion site..." No sludge has been pumped to the settling ponds since then.

Attachment 13.7
Ken Renshaw



Georgia-Pacific Corporation

133 Peachtree Street, N.E. (30303)
P.O. Box 105605
Atlanta, Georgia 30348-5605
Telephone (404) 521-4000

September 2, 1988

Mr. Brian E. Healy
C.C. Johnson & Malhotra, P.C.
200 West Adams Street
Suite 1601
Chicago, Illinois 60606

Re: Birch Road Groundwater Study

Dear Mr. Healy:

This is in response to your request for information concerning the Georgia-Pacific settling ponds in Gary, Indiana located near the intersection of Birch Road and Clark Street. As I understand it you had asked for the information in conjunction with your hydrogeologic study to determine the source of heavy metal contamination detected in a few area monitoring wells.

First of all, let me apologize for our taking so long to respond to your request. As you are aware, we have been in the process of gathering information on the settling area which we felt was the more urgent priority, especially since we knew there was no reason to expect any heavy metal contamination from the historical operations at our facility. The samples collected on G-P's property (the results were recently sent to us by Mr. James R. Ursic of EPA) tended to support our view that we were not the source of any heavy metal contamination problem. The following history has been pulled together primarily with the help of Mr. Chester S. Adamczyk who has been the manager of our facility from April, 1970 to the present and Mr. Kenneth J. Renshaw, Technical Director at the facility from 1978 to the present.

Per Mr. Ursic's request I am attaching a plot plan showing the facility boundaries as attachment A.

G-P acquired the facility on August 1, 1964 from the Steiner Corporation and has used the plant primarily in the production of industrial grade paper towels. Waste paper and purchased wood pulp are the basic raw materials in this process.

The major solid waste generated at the facility is clarifier sludge removed from the primary clarifier. The sludge consists mainly of cellulose fiber fragments. Additionally, it contains water, some residual quantities of process additives and clay, and other inorganic pigments removed from waste paper during the manufacturing process. The waste does not exhibit any hazardous waste characteristics. (Please see attachment B for an analysis of the sludge.) The above would constitute the overwhelming majority of waste generated at the facility, and to our knowledge, the solid waste now found in the settling ponds.

Mr. Brian E. Healy
September 2, 1988
Page 2

All wastewater from the mill is pumped to a clarifier. Historically, the settled material from this clarifier is a sludge which was formerly pumped to two holding lagoons for dewatering. Since the installation of a screw press, the lagoons have not received the clarifier's under flow.

Beginning in August, 1983, the sludge was taken from the screw press to the Gary Airport exclusion site.

As the results in attachment B indicate, there is no reason to suspect G-P's operations as a source of heavy metals under investigation in the subject groundwater study.

Should you have any additional questions, please call me at (404) 521-4654.

Sincerely,

John H. Anderson
A. Anderson

J. A. Anderson
Senior Environmental Engineer

JAA/rwh

cc: James R. Ursic, Geologist (w/attachments)
Technical Support Unit
USEPA Region 5
Mail Code 5HR-11/TSU
230 South Dearborn Street
Chicago, Illinois 60604

bc: D. A. Martinez - G-9
~~G. D. Dutton - G-9~~
 G. D. Dutton - G-9
 A. F. Hodges - G-11
 R. A. Horder - G-11
 K. J. Renshaw - Gary, Indiana

ANALYSIS REPORT

Sample Source: Ken Renshaw - Gary, Indiana

Sample Description: A - No. 2 pulper; B - fresh sludge from primary clarifier; C - new sludge bed ; and D - old sludge bed


RESULTS, IN PPM, UTILIZING EPA EXTRACTION AND ANALYTICAL PROCEDURES

<u>Contaminant</u>	<u>EPA Limit*</u>	<u>Sample A</u>	<u>Sample B</u>	<u>Sample C</u>	<u>Sample D</u>
Arsenic	5	<0.006	<0.16	<0.06	<0.08
Barium	100	0.7	<2.0	0.3	<1.0
Cadmium	1	0.03	0.05	<0.01	<0.01
Chromium	5	<0.04	<0.1	<0.04	<0.04
Lead	5	0.3	0.3	0.2	0.1
Mercury	0.2	0	0	<0.001	<0.001
Selenium	1	0	0	0	0.02
Silver	5	0	0	0	0

cc: B. Warsham

*Maximum extract concentration above which the sample is designated a toxic hazardous substance under RCRA.

Attachment P. 2

Auburn 
Box F-R

H. P. SMITH PAPER CO.

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

012061

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

Authorization Number 79 0 6

Chicago, Illinois
City

Illinois
State

EPA ID NO ILD0071685

0316000246

Generator Number

WASTE HAULER(S)

(1) D & J Waste Refuse
Hauler Name

654 E. 161 St ST
South Holland Illinois
Hauler Address

S.W.H. Registration Number 086800

(2) _____
Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

~~XXXXXX~~ ALBURN INC.
(Facility Name)

119th Street

03160003

Chicago
City

Illinois
State

Site Number

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:
SHIPPING DESCRIPTION:

Solvent N.O.S.

EPA Waste No. D001

14,400 LBS.

HAZARD CLASS:

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION,
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 6/25/81

Edward M. Baker
(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED: 001760

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS
INDICATED:

(1) *[Signature]*
(Authorized Signature)

(2) _____
(Authorized Signature)

DATE 06/25/81

DATE

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED

[Signature]
(Authorized Signature)

Permit Applied For 6/25/81

REMARKS/SPECIAL INSTRUCTIONS:

ILLINOIS 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS 800 / 424-8802

DISTRIBUTION: PART 1 GENERATOR

PART 2 (EPA)

PART 3 SITE

PART 4 HAULER

PART 5 (EPA)

PART 6 GENERATOR

SITE COPY - PART 3

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120688

Authorization Number 79 0 6 5 0

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

EPA ID NO ILD00716852

Chicago, Illinois.
City

Illinois.
State

0 3 1 6 0 0 0 2 4 6 6
Generator Number

WASTE HAULER(S)

(1) D & J Waste Refuse
Hauler Name

654 E. 161 St ST
South Holland Illinois
Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1

(2)

Hauler Name

Hauler Address

S.W.H. Registration Number 32 38

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

~~XXXXXX~~ ALBURN INC.
(Facility Name)

119th Street

0 3 1 6 0 0 3 1
Site Number

Chicago,
City

Illinois.
State

Zip

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

~~XXXXXXXXXX~~

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW.

14,400 LBS.

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 6/25/81

(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED: 0 0 1 7 6 0

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

RECEIVED

OTHER (Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1)

(Authorized Signature)

FEB 3 1983

DATE 06 / 25 / 81

(2)

(Authorized Signature)

DATE: / /

ATTORNEY GENERAL

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

(Authorized Signature)

Permit Applied For 6/25/81

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS:

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

000651

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120688

Authorization Number 79 0 6 5 0

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

EPA ID NO ILD00716852

Chicago, Illinois.
City

Illinois.
State

0 3 1 6 0 0 0 2 4 6
Generator Number

WASTE HAULER(S)

(1) D & J Waste Refuse
Hauler Name

654 E. 161 St ST
South Holland Illinois
Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1

(2) _____
Hauler Name

Hauler Address

S.W.H. Registration Number _____

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

~~XXXXXX~~ ALBURN INC.
(Facility Name)

119th Street

0 3 1 6 0 0 3 1
Site Number

Chicago,
City

Illinois.
State

Zip

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

~~XXXXXXXX~~

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400 LBS.

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

550000

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 6/25/81

Edward M. Baker
(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED: 0 0 1 7 6 0

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

RECEIVED

OPEN TRUCK

OTHER

(Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED.

FEB 3 1983

DATE: 06 / 25 / 81

(1) *[Signature]*
(Authorized Signature)

(2) _____
(Authorized Signature)

ATTORNEY GENERAL

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

Permit Applied For DATE 6/25/81

COMMENTS OR SPECIAL INSTRUCTIONS:

7468

IN ILLINOIS: 217/782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART 1 - GENERATOR

PART 2 - EPA

PART 3 - SITE

PART 4 - HAULER

PART 5 - EPA

PART 6 - GENERATOR

SITE COPY - PART 3

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120687

Authorization Number 790650

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street
Address

Chicago
City

Illinois
State

60638
Zip

EPA ID NO ILD000716852
0316000246
Generator Number

(1) D & J Waste Refuse
Hauler Name

654 E 161st St
South Holland Illinois
Hauler Address

S.W.H. Registration Number 0368-001

(2)

Hauler Name

Hauler Address

S.W.H. Registration Number 37

DESTINATION -- DISPOSAL STORAGE OR TREATMENT SITE

~~ALBURN INC~~
ALBURN INC
(Facility Name)

119th Street
Address

Chicago
City

Illinois
State

Zip

031600031
Site Number

ILD 000 716 852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:
SHIPPING DESCRIPTION:

Solvent N.O.S

14,400 LBS
HAZARD CLASS

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION.
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

Edward McLeish
(Authorized Signature)

DATE 5/27/81

WASTE HAULER*

QUANTITY OF WASTE RECEIVED 03760
RECEIVED

GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TROCK

OTHER (Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:
FEB 3 1983

(1) (Authorized Signature)

DATE 05/27/81

(2) (Authorized Signature)

DATE

ATTORNEY GENERAL

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

Permit# Applied For 52781
DATE

James H. Elden
(Authorized Signature)

COMMENTS OR SPECIAL INSTRUCTIONS:

ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS*

OUTSIDE ILLINOIS: 800 / 424-8800

REGULATION: PART 1 GENERATOR

PART 2 EPA

PART 3 SITE

PART 4 HAULER

PART 5 ILPA

PART 6 GENERATOR

00650

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120687

Authorization Number 7 9 0 6 5 0

E.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

Address

EPA ID NO ILD000716852

0 3 1 6 0 0 0 2 4 6

Generator Number

Chicago

City

Illinois

State

60638

Zip

WASTE HAULER(S)

(1) D & J Waste Refuse

Hauler Name

654 E 161st St

South Holland Illinois

Hauler Address

S.W.H. Registration Number 0 8 6 8 - 0 0 1

(2)

Hauler Name

Hauler Address

S.W.H. Registration Number 32 38

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

ALBURN INC

(Facility Name)

119th Street

Address

0 3 1 6 0 0 3 1

Site Number

Chicago

City

Illinois

State

Zip

ILD 000 716 852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

600000

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS. 14,400 LBS

Solvent N.O.S

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

Edward M. Leach

DATE: 5/27/81

(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED 0 0 1 7 6 0

GALLONS

(Circle One)

CU. YDS.

52

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

RECEIVED

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

FEB 3 1983

(1) (Authorized Signature)

DATE: 5/27/81

(2) (Authorized Signature)

DATE: / /

ATTORNEY GENERAL

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

Permit# Applied For 5,27,81

DATE: 5/27/81

COMMENTS OR SPECIAL INSTRUCTIONS:

7467

ILLINOIS: 217 / 782 3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

TRIBUTION: PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE-HAULING MANIFEST
WASTE GENERATOR

0120687

Authorization Number 790650

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street
Address

EPA ID NO ILD000716852
0316000246
Generator Number

Chicago
City

Illinois 60638
State Zip

WASTE HAULER(S)

(1) D & J Waste Refuse
Hauler Name

654 E 161st St
South Holland Illinois
Hauler Address

S.W.H. Registration Number 0368-09

(2) _____
Hauler Name

Hauler Address

S.W.H. Registration Number _____

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

ALBURN INC
(Facility Name)

119th Street
Address

03160003
Site Number

Chicago
City

Illinois _____
State Zip

ILD 000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. D001

HAZARD CLASS. 14,400 LBS

THE ☒ AL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:
SHIPPING DESCRIPTION:

Solvent N.O.S

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

Edward M. Leach
(Authorized Signature)

DATE 5/27/81

WASTE HAULER*

QUANTITY OF WASTE RECEIVED 0,01760

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER _____ (Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION INDICATED:

(1) _____
(Authorized Signature)

7461

DATE 5/27/81

(2) _____
(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

Permit# Applied For 5/27/81
DATE

James H. Elders
(Authorized Signature)

COMMENTS OR SPECIAL INSTRUCTIONS:

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120689

992933

Authorization Number

790650

H.P. Smith Paper Co.

(Company Name)

5001 West 66th Street

Address

Chicago, Illinois

Illinois

City

State

Zip

EPA ID NO ILD00716852

0316000246

14

Generator Number

24

WASTE HAULER(S)

(1) D. & J. Waste Refuse

Hauler Name

South Holland Illinois

Hauler Address

S.W.H. Registration Number

0868001

25

31

(2)

Hauler Name

Hauler Address

S.W.H. Registration Number

32

38

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.

(Facility Name)

119th Street

Address

Chicago,

City

Illinois

State

Zip

03160031

39

Site Number

49

ILD 000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

14,400 LBS.

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE:

7-29-81

(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED: 0.01760

1 GALLONS
2 CU. YDS.

(Circle One)

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER

(Specify)

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1)

(Authorized Signature)

FEB 3 1983

DATE:

54

59

(2)

(Authorized Signature)

DATE:

54

59

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

ATTORNEY GENERAL

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

(Authorized Signature)

Permit Applied For

DATE:

54

59

COMMENTS OR SPECIAL INSTRUCTIONS:

1782363

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 424 88

PART 2 EPA

PART 3 SITE

PART 4 HAULER

PART 5 EPA

PART 6 GENERATOR

00652

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

01206883

992933

Authorization Number

790650

P.P. Smith Paper Co.

(Company Name)

5001 West 66th Street

Address

Chicago, Illinois.

Illinois

City

State

Zip

EPA ID NO ILD00716852

0316000246

14

Generator Number

24

WASTE HAULER(S)

(1) **D. & J. Waste Refuse**

Hauler Name

South Holland Illinois

Hauler Address

S.W.H. Registration Number **0868001**

25

31

(2)

Hauler Name

Hauler Address

S.W.H. Registration Number

32

38

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.

(Facility Name)

119th Street

Address

Chicago.

Illinois.

City

State

Zip

03160031

39

Site Number

46

ILD 000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME **Solvent N.O.S.**

00000

WASTE PHASE: **Liquid**

(Liquid, Gaseous, Solid)

EPA Waste No. **D001**

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

Solvent N.O.S.

14,400 LBS.

HAZARD CLASS:

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: **7-29-81**

Edward M. Paul
(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED: **001760**

1 GALLONS
2 CU. YDS.

(Circle One)

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER

(Specify)

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) *[Signature]*
(Authorized Signature)

FEB 3 1983

DATE: **7/29/81**

(2) *[Signature]*
(Authorized Signature)

DATE: **7/29/81**

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

ATTORNEY GENERAL

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

James H. Elders
(Authorized Signature)

Permit Applied For DATE: **7/29/81**

COMMENTS OR SPECIAL INSTRUCTIONS

7469

7/29/81

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8800

GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120690

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street
Address

Chicago, Illinois
City

Illinois 60638
State Zip

Authorization Number 9 9 2 9 3 3

EPA ID NO ILD00716852

0 3 1 6 0 0 0 2 4 6
Generator Number

WASTE HAULER(S)

(1) D & J Waste Refuse
Hauler Name

South Holland Illinois
Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1

(2) ~~SEAN'S WASTE~~
Hauler Name

~~SEAN'S WASTE~~
Hauler Address

S.W.H. Registration Number ~~0 8 6 8 0 0 1~~

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.
(Facility Name)

119th Street
Address

0 3 1 6 0 0 3 1
Site Number

Chicago, Illinois
City

Illinois
State Zip

FED-ID
NO ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW: 14.400 LBS.
SHIPPING DESCRIPTION: HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 8/27/81

(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED: 0 0 1 7 5 0

GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER

(Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED: FEB 3 1983

(1)

(Authorized Signature)

DATE: 8/27/81

(2)

(Authorized Signature)

ATTORNEY GENERAL

DATE: / /

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

(Authorized Signature)

Permit Applied For DATE: 8/27/81

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782 3637

*24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424 8802

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 EPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 EPA

PART - 6 GENERATOR

SITE COPY - PART 3

00653

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120690

Authorization Number 992933

EPA ID NO ILD00716852

0316000246
Generator Number

H. Smith Paper Co.
(Company Name)

5001 West 66th Street

Address

Chicago, Illinois
City

Illinois
State

60638
Zip

WASTE HAULER(S)

(1) D & J Waste Refuse
Hauler Name

South Holland Illinois
Hauler Address

S.W.H. Registration Number 0868001

(2) ~~XXXXXXXXXX~~
Hauler Name

~~XXXXXXXXXX~~
Hauler Address

S.W.H. Registration Number ~~XXXXXXXXXX~~

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.
(Facility Name)

119th Street

Address

Chicago, Illinois
City

Illinois
State

Zip

03160031
Site Number

FED-ID
NO ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW: 14.400 LBS.
SHIPPING DESCRIPTION: HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 8/27/81

(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED: 001760

GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER

(Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED

(1) ~~XXXXXXXXXX~~
(Authorized Signature)

DATE: 8/27/81

(2) ~~XXXXXXXXXX~~
(Authorized Signature)

ATTORNEY GENERAL

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

~~XXXXXXXXXX~~
(Authorized Signature)

Permit Applied For DATE: 8/27/81

COMMENTS OR SPECIAL INSTRUCTIONS:

7470

IN ILLINOIS: 217-782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800/424-8802

DISTRIBUTION: PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

ATOR

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

SPECIAL WASTE HAULING MANIFEST

0213107

Authorization Number 9 9 2 9 3 3

H. P. Smith Paper Co.

(Company Name)

5001 West 66th Street

Address

Chicago

City

Illinois

State

60638

Zip

EPA ID NOILD00716852

0 3 1 6 0 0 0 2 4 6 6

Generator Number

WASTE HAULER(S)

D & D Waste Refuse

Hauler Name

654 E 161st St South Holland

Hauler Address

W.H. Registration Number 0 8 6 8 0 0 1

Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc

(Facility Name)

119th Street

Address

Chicago

City

Illinois

State

Zip

0 3 1 6 0 0 3 1

Site Number

FED ID#ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

EPA Waste No.D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE

14,400LBS

14,400

LBS
(circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED 0 0 1 760

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 9.23.81

(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1)

(Authorized Signature)

(2)

(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

(Authorized Signature)

Permit Applied For

DATE: 9/23/81

COMMENTS OR SPECIAL INSTRUCTIONS

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

SITE COPY - PART 3

00634

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273107

Authorization Number 9 9 2 9 3 3

EPA ID NO ILD00716852

0 3 1 6 0 0 0 2 4 6
Generator Number

H. F. Smith Paper Co.
(Company Name)

5001 West 66th Street
Address

Chicago
City

Illinois
State

60638
Zip

WASTE HAULER(S)

D & H Waste Refuse
Hauler Name

654 E 161st St South Holland
Hauler Address

W.H. Registration Number 0 8 6 8 0 0 1

Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc
(Facility Name)

119th Street
Address

0 3 1 6 0 0 3 1
Site Number

Chicago
City

Illinois
State

Zip

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400LBS

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE

14,400

14,400
LBS
(circle one)
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL

QUANTITY OF WASTE DELIVERED 0 0 1 760

1 GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE 9-23-81

Edward M. Lewis
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED.

(1) [Signature]
(Authorized Signature)

(2)
(Authorized Signature)

RECEIVED

FEB 3 1983

DATE 9/23/81

DATE

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

ATTORNEY GENERAL

HAZARDOUS WASTE SUBJECT TO FEE YES NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

[Signature]
(Authorized Signature)

Permit Applied For

DATE 9/23/81

COMM. OR SPECIAL INSTRUCTIONS

7471

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART 1-GENERATOR

PART 2-IEPA

PART 3-SITE

PART 4-HAULER

PART 5-IEPA

PART 6-GENERATOR

SITE COPY - PART 3

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

0273108

SPECIAL WASTE HAULING MANIFEST

Authorization Number 992933

H.P. Smith Paper Co

(Company Name)

5001 W. 66TH ST.

Address

CHICAGO

City

ILLINOIS

State

60638

Zip

EPA ID NO. ILD000716852

0316000246

Generator Number

D+J WASTE REUSE

Hauler Name

654 E 161ST SOUTH ISLAND

Hauler Address

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

ALBURN INC.

(Facility Name)

119TH STREET

Address

CHICAGO

City

ILLINOIS

State

Zip

03160031

Site Number

EPA ID NO. ILD0006716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: SOLVENT N.O.S.

WASTE PHASE: LIQUID
(Liquid, Gaseous, Solid)

E.P.A. WASTE NO. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

SOLVENT N.O.S.

FLAMMABLE LIQUID

WEIGHT FOR
D.O.T. USE 14400

BS
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0.01760

GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION.

DATE: 10-21-81

Edward M. [Signature]

(Authorized Signature)

RECEIVED

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED.

(1) [Signature]
(Authorized Signature)

(2) [Signature]
(Authorized Signature)

ATTORNEY GENERAL

DATE: 10/21/81

DATE: 10/21/81

DISPOSAL, STORAGE, OR TREATMENT FACILITY

HAZARDOUS WASTE SUBJECT TO FEE YES NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

[Signature]
(Authorized Signature)

Permit Applied For

DATE: 10/21/81

COMMENTS OR SPECIAL INSTRUCTIONS

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

00657

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

0273108

SPECIAL WASTE HAULING MANIFEST

Authorization Number 992933

H.P. Smyth Paper Co
(Company Name)
CHICAGO
City

5001 W. 66TH ST.
Address
ILLINOIS
State
60638
Zip

EPA ID NO ILD00716852
0316000246
Generator Number

D+J WASTE REFIN
Hauler Name

654 E 161 ST SOUTH ARLAND
Hauler Address

S.W.H. Registration Number 0868001
S.W.H. Registration Number

ALBURN INC.
(Facility Name)
CHICAGO
City

119TH STREET
Address
ILLINOIS
State

03160031
Site Number
FED ID # ILD006716852
Zip

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: SOLVENT N.O.S.

WASTE PHASE: LIQUID
(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

SOLVENT N.O.S.

FLAMMABLE LIQUID

WEIGHT FOR D.O.T. USE 14400 LBS
(circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0.01760

1 GALLON (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 10-21-81

Edward M. ...
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED

(1) [Signature]
(Authorized Signature)

(2) [Signature]
(Authorized Signature)

ATTORNEY GENERAL
DATE: 10/21/81
DATE: 10/21/81

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

[Signature]
(Authorized Signature)

PERMIT APPLIED FOR

DATE: 10/21/81

COMMENTS OR SPECIAL INSTRUCTIONS:

7472

IN ILLINOIS: 217/782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800/424-8802

DISTRIBUTION: PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

SPECIAL WASTE HAULING MANIFEST

0273109

Authorization Number 992933
EPA ID NO. ILD00716852

H.P. Smith Paper Co.
(Company Name)

5001 W. 66th St.
Address

Chicago
City

Illinois
State

60638
Zip

03160002466
Generator Number

D & J Waste Refuse
Hauler Name

654 E. 161st St. S. Holland
Hauler Address

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

S.W.H. Registration Number 32

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.
(Facility Name)

119th Street
Address

Chicago
City

Illinois
State

Zip

031600031
Site Number

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. Dool

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400 LBS

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR D.O.T. USE 14,400 LBS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0.01760

GALLONS (circle one)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION.
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 11/12/81

(Authorized Signature)

WASTE HAULER

RECEIVED

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) (Authorized Signature)

FEB 3 1983

DATE: 11/12/81

(2) (Authorized Signature)

DATE: / /

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

ATTORNEY GENERAL

HAZARDOUS WASTE SUBJECT TO FEE YES NO

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

(Authorized Signature)

Permit Applied For

DATE: 11/14/81

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

00658

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273109

H.P. Smith Paper Co.
(Company Name)

5001 W. 66th St.

Chicago

City

Illinois

State

60638

Zip

Authorization Number 992933
EPA ID NO. ILD00716852

0316000246
Generator Number

D & J Waste Refuse
Hauler Name

654 E. 161st St. S. Holland

Hauler Address

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.

(Facility Name)

119th Street

Address

Chicago

City

Illinois

State

Zip

031600031
Site Number

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. Dool

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400 LBS

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE 14,400 LBS
(circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0.01760

GALLONS (circle one)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION,
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 11/12/81

(Authorized Signature)

WASTE HAULER

RECEIVED

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS
INDICATED.

(1) (Authorized Signature)

FEB. 3 1983

DATE: 11/12/81

(2) (Authorized Signature)

DATE: 11/12/81

DISPOSAL, STORAGE, OR TREATMENT FACILITY

ATTORNEY GENERAL

HAZARDOUS WASTE SUBJECT TO FEE YES NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE.

(Authorized Signature)

Permit Applied For

DATE: 11/12/81

COMMENTS OR SPECIAL INSTRUCTIONS:

7473

IN ILLINOIS: 217/782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800/424-8802

DISTRIBUTION: PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602

PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617

(312) 743-4966

NO. 1738

GENERATOR

H.P. Smith Paper Co.

David Vander Pong

11-12-82 11:45

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

71 DO 0570423

Gals.

11400

SOLVENT 32 Drums

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Alburn Inc.

Permit No.

03160051

Address

2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

William C. Allen

11-12-82

11:39

Signature of Operator and Title

Date

Time

REMARKS

8. 7000
16,891 BTU's
0.661158

00659

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0661758

Authorization Number 992933

H.P. Smith Paper Co 5001 W. 66th ST. 312 458 0777 031600246
Company Name Address Phone Number
CHICAGO ILL 60638 ILD005120423
City State Zip EPA Number

D+J WASTE 160 E. 168th ST South Holland IL 312 331 5171 0868001
Hauler Name Hauler Address Phone Number S.W.H. Registration Number
ILT180011397
EPA Number

Hauler Name Hauler Address Phone Number EPA Number

ALBURN INC 2200 E. 19th ST 03160031
(Facility Name) Address Site Number
CHICAGO ILL ILD0000716852
City State Zip Phone Number EPA Number

Alternate (Facility Name) Address Site Number
City State Zip Phone Number EPA Number

TO BE COMPLETED BY
WASTE GENERATOR WASTE NAME: SOLVENT N.O.S. WASTE PHASE: LIQUID
(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION: SOLVENT N.O.S. FLAMMABLE LIQUID HAZARD CLASS: NA 1993
UN or NA Number EPA HW Number

WEIGHT FOR D.O.T. USE 11400 LBS (circle one) WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL. QUANTITY OF WASTE DELIVERED: 001760
2 CU YDS. (circle one)

METHOD OF SHIPMENT (Circle One) (DRUMS 32) TANK TRUCK OPEN TRUCK OTHER (Specify) Number

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION.
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION Edward M. Lewis
(Authorized Signature) DATE: 11/12/82

WASTE HAULER I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE
THE DESTINATION AS INDICATED:

(1) David J. J. Jan (Authorized Signature) DATE: 11/14/82
(2) (Authorized Signature) DATE: 1/1/83

DISPOSAL, STORAGE, OR TREATMENT FACILITY: HAZARDOUS WASTE SUBJECT TO FEE YES NO
I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE
William L. (Authorized Signature) DATE: 11/17/82

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782-3637 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS OUTSIDE ILLINOIS: 800 / 424-2802 or 202 / 426-2675
DISTRIBUTION PART 1 GENERATOR PART 2 EPA PART 3 SITE PART 4 HAZARDOUS WASTE PART 5 EPA PART 6 GENERATOR

REV. # 4 00660

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

GENERATOR

H. P. Smith Boston, C.

Signature of Generator's Agent and Title

Date _____

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID#

Gals.

SOLVENT 32 Brine

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Permit No.

Address

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title

Date _____

Time

REMARKS

7432

ALBURN, Inc.

OFFICE: 111 W. WA. HINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

No 1738

GENERATOR

H.P. Smith Paper Co.

David Vander Ploom

Signature of Generator's Agent and Title

11-12-82

Date

11:40

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

72000570423

Gals.

11400

SOLVENT 32 Drums

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Alburn Inc.

Permit No.

03160031

Address

2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

William Collier, Assessor/Gen.

Signature of Operator and Title

11-12-82

Date

12:39

Time

REMARKS

.8 % CP

.72 % ash

16,891 BTU's
lt

0.661758

7493

527

**TO BE COMPLETED BY
WASTE GENERATOR**

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0661758

Authorization Number 992933

H.P. Smith Paper Co. 5001 W. 66th ST. 3124580777 0316000246
(Company Name) Address Phone Number Generator Number
CHICAGO ILL 60638 ILD005120423
City State Zip EPA Number

D+J WASTE 160 E. 168th ST South Holland IL 3123315171 0868001
Hauler Name Hauler Address Phone Number S.W.H. Registration Number
ILT180011397
EPA Number

Hauler Name Hauler Address Phone Number S.W.H. Registration Number EPA Number

ALBURN INC 2200 E. 19th ST 03160031
(Facility Name) Address Site Number
CHICAGO ILL IL0000716852
City State Zip Phone Number EPA Number

Alternate (Facility Name) Address Site Number EPA Number
City State Zip Phone Number

**TO BE COMPLETED BY
WASTE GENERATOR** WASTE NAME: SOLVENT N.O.S. WASTE PHASE: LIQUID
(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:
SHIPPING DESCRIPTION: SOLVENT N.O.S. HAZARD CLASS: FLAMMABLE LIQUID UN or NA Number: NA 1993 EPA HW Number: D001

WEIGHT FOR D.O.T. USE 11400 LBS. TONS (circle one) WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL. QUANTITY OF WASTE DELIVERED: 001760 2 CU. YDS. 1 GALLONS (Circle One)
METHOD OF SHIPMENT (Circle One) (DRUMS 32 TANK TRUCK OPEN TRUCK OTHER (Specify))

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.
I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION Edward Milburn DATE: 11/12/82
(Authorized Signature)

WASTE HAULER I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:
(1) David Vand... DATE: 11/13/82
(Authorized Signature) (54) (59)
(2) _____ DATE: _____
(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY* HAZARDOUS WASTE SUBJECT TO FEE YES _____ NO X
I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE William... DATE: 11/12/82
(Authorized Signature) (60) (65)

COMMENTS OR SPECIAL INSTRUCTIONS: 7496

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 19TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

GENERATOR

W. P. G. H. B. 1. 1. 1.

Signature of Generator's Agent and Title

Date _____

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

Gals.

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name _____

Permit No. 42-10007**Address**

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title

Date _____

Time

REMARKS

32 drums

7483

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

0273110

SPECIAL WASTE HAULING MANIFEST

Authorization Number 9 9 2 9 3 3

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

Address

Chicago

City

ILLINOIS

State

60638

Zip

EPA ID N01LD00716852

0 3 1 6 0 0 0 2 4 6 0

Generator Number

(312) 458-0777

D & J Waste Refuse

Hauler Name

654 E. 161st St. South Holland

Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1

25 31

Hauler Name

Hauler Address

S.W.H. Registration Number 32 38

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.

(Facility Name)

119th Street

Address

Chicago

City

Illinois

State

Zip

0 3 1 6 0 0 3 1

Site Number

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

UN 1993

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400 Lbs

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE 14,400

14,400 LBS
(circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0 0 1 7 6 0

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 12/22/81

(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED

(1) Dave Vanden Lee

(Authorized Signature)

(2)

(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY

RECEIVED
FEB 3 1983
ATTORNEY GENERAL

HAZARDOUS WASTE SUBJECT TO FEE YES NO X

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE

(Authorized Signature)

Permit Applied For

DATE: 12/22/81

COMMENTS OR SPECIAL INSTRUCTIONS

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 421-8802

DISTRIBUTION: PART 1 GENERATOR

PART 2 EPA

PART 3 SITE

PART 4 HAULER

PART 5 EPA

PART 6 GENERATOR

SITE COPY - PART 3

00661

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273110

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

Address

Chicago

City

ILLINOIS

State

60638

Zip

Authorization Number 9 9 2 9 3 3
13

EPA ID N01LDO0716852

0 3 1 6 0 0 0 2 4 6
14 24

Generator Number

(312) 458-0777

WASTE HAULER(S)

D & J Waste Refuse

Hauler Name

654 E. 161st St. South Holland

Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1
25 31

Hauler Name

Hauler Address

S.W.H. Registration Number 32 38

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.

(Facility Name)

119th Street

Address

0 3 1 6 0 0 3 1
39 46

Site Number

Chicago

City

Illinois

State

Zip

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

UN 1993

EPA Waste No. D001
14,400 Lbs

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE 14,400
LBS
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0 0 1 7 6 0
47 52

GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION,
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 12/22/81

(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS
INDICATED

(1)

Dave Vander Luan

(Authorized Signature)

(2)

(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

RECEIVED
FEB 3 1983
ATTORNEY GENERAL

HAZARDOUS WASTE SUBJECT TO FEE YES NO X

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE.

DATE: 12/23/81

(Authorized Signature)

Permit Applied For

COMMENTS OR SPECIAL INSTRUCTIONS

7474

IN ILLINOIS 217/782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS 800/424-8800

DISTRIBUTION: PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

MP 1336

GENERATOR

H. P. Smith, Pearson Co.

No.

2-12-82

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

LD00716852

Gals.

1700

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Alburn Inc.

Permit No.

2-11-82

Address

2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title

Date

Time

REMARKS

32 drums solvent
cl

7480



OFFICE OF THE ATTORNEY GENERAL

TYRONE C. FAHNER
ATTORNEY GENERAL
STATE OF ILLINOIS

TO:

DATE:

FROM:

RE:

- ☐ TAKE NECESSARY ACTION
- ☐ FOR YOUR APPROVAL
- ☐ APPROVED
- ☐ REPLY
- ☐ RE-DO AND RE-SUBMIT
- ☐ FOR YOUR COMMENTS
- ☐ FOR YOUR INFORMATION
- ☐ FOR YOUR SIGNATURE

- ☐ DRAFT (LETTER) (MEMO) FOR
(MY) (YOUR) SIGNATURE
- ☐ PER OUR CONVERSATION
- ☐ SEE ME ABOUT ATTACHED
- ☐ RETURN
- ☐ FILE
- ☐ SEE REVERSE SIDE FOR
ADDITIONAL COMMENTS

REMARKS:

No Cool Ticket

7485

221

STATE OF ILLINOIS

TO BE COMPLETED BY
WASTE GENERATORENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

0273112

SPECIAL WASTE HAULING MANIFEST

Authorization Number 992933
EPA ID NO. ILD00716852H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

Address

Chicago

City

Illinois

State

60638

Zip

03160002466

Generator Number

(312) 458-0777

WASTE HAULER(S)

D & J Waste Refuse

Hauler Name

654 E. 161st St. S. Holland

Hauler Address

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.

(Facility Name)

119th Street

Address

Chicago

City

Illinois

State

Zip

031600031

Site Number

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. D001

14,400 LBS

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE

14,400

LBS

TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL

QUANTITY OF WASTE DELIVERED: 001760

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION,
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 2/9/82

Sara Despresinski
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS
INDICATED.(1) Sam Heenstra
(Authorized Signature)

RECEIVED

FEB 3 1983

DATE 02/10/82

(2) _____
(Authorized Signature)

DATE: / /

DISPOSAL, STORAGE, OR TREATMENT FACILITY

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

ATTORNEY GENERAL

HAZARDOUS WASTE SUBJECT TO FEE

YES

NO

William Collins
(Authorized Signature)

Permit Applied For

DATE 02/11/82

COMMENTS OR SPECIAL INSTRUCTIONS:

7486

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART 1 GENERATOR

PART 2 ILPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273112

Authorization Number 992933
EPA ID NO. ILD00716852

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street
Address

Chicago
City

Illinois
State

60638
Zip

03160002466
Generator Number

(312) 458-0777

WASTE HAULER(S)

D & J Waste Refuse
Hauler Name

654 E. 161st St. S. Holland
Hauler Address

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc.
(Facility Name)

119th Street
Address

031600031
Site Number

Chicago
City

Illinois
State

Zip

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. D001

14,400 LBS

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR D.O.T. USE 14,400 LBS
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL

QUANTITY OF WASTE DELIVERED: 0.01760

1 GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 7/9/82

Susan Depewski
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(S)

Sam Heemstra
(Authorized Signature)

DATE: 07/10/82

(D)

(Authorized Signature)

DATE:

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES NO X

REBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

William Pallas
(Authorized Signature)

Permit Applied For

DATE: 07/10/82

MENTS OR SPECIAL INSTRUCTIONS:

7481

DIS 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-880

ITION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

SITE COPY - PART 3



OFFICE OF THE ATTORNEY GENERAL

TYRONE C. FAHNER
ATTORNEY GENERAL
STATE OF ILLINOIS

TO:

DATE:

FROM:

RE:

- ☐ TAKE NECESSARY ACTION
- ☐ FOR YOUR APPROVAL
- ☐ APPROVED
- ☐ REPLY
- ☐ RE-DO AND RE-SUBMIT
- ☐ FOR YOUR COMMENTS
- ☐ FOR YOUR INFORMATION
- ☐ FOR YOUR SIGNATURE

- ☐ DRAFT (LETTER) (MEMO) FOR
(MY) (YOUR) SIGNATURE
- ☐ PER OUR CONVERSATION
- ☐ SEE ME ABOUT ATTACHED
- ☐ RETURN
- ☐ FILE
- ☐ SEE REVERSE SIDE FOR
ADDITIONAL COMMENTS

REMARKS:

No Cool Ticket

521

00648

TO BE COMPLETED BY
WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

SPECIAL WASTE HAULING MANIFEST

0473112

Authorization Number 992933
EPA ID NO. ILD00716852

H.P. Smith Paper Co. 5001 West 66th Street
(Company Name) Address
Chicago Illinois 60638
City State Zip

03160002466
Generator Number
(312) 458-0777

D & J Waste Refuse 654 E. 161st St. S. Holland
Hauler Name Hauler Address S.W.H. Registration Number 0868001
25 31

Hauler Name Hauler Address S.W.H. Registration Number 32 18

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc. 119th Street
(Facility Name) Address
Chicago Illinois
City State Zip

031600031
Site Number

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400 LBS

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR O.D.T. USE 14,400 LBS
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0,0-176-0

1 GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 2/9/82

(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1)

Sam Heemstra

(Authorized Signature)

FEB 3 1983

DATE: 02 14 83

(2)

(Authorized Signature)

DATE: / /

DISPOSAL, STORAGE, OR TREATMENT FACILITY

ATTORNEY GENERAL

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE

William P. Pallas

(Authorized Signature)

Permit Applied For

DATE: 02 14 83

COMMENTS OR SPECIAL INSTRUCTIONS

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

00649

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4968

BYO 1898

GENERATOR

HR Smith & PARLO

[Signature]

3-30-82

9:30

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID#

1270000716852

Gals.

32 Drums
1700

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Alburn Inc.

Permit No.

0316-031

Address

2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title

Date

Time

[Signature]

3-30-82

9:10 AM

REMARKS

[Handwritten notes in Remarks section]

00640

522

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273114

Authorization Number 992933

H.P. Smith Paper Co. 5001 W. 66th Street
(Company Name) Address
Chicago Illinois 60638
City State Zip

0316000246
Generator Number 312/458-0777

D & J Waste Refuse 654 E 161st St S. Holland, Ill
Hauler Name Hauler Address

S.W.H. Registration Number 0868001

Hauler Name Hauler Address

S.W.H. Registration Number 32 38

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc 119th Street
(Facility Name) Address
Chicago, Ill Illinois
City State Zip

03160031
Site Number

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

E.P.A. Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

14,400 LBS

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE 14,400

1 GALLONS (circle one)
LBS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 001700

1 GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 3/30/82

Edward J. [Signature]
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) [Signature]
(Authorized Signature)

(2) [Signature]
(Authorized Signature)

DATE: 03/30/82

DATE: 1/1/82

DISPOSAL, STORAGE, OR TREATMENT FACILITY

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE.

[Signature]
(Authorized Signature)

Permit Applied For

DATE: 3/30/82

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217/782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800/424-8802

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

SITE COPY - PART 3

00641

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

OK

NO 1398

GENERATOR

H.R. Smith & Assoc. Inc.

John Mitchell

Signature of Generator's Agent and Title

3-30-82

Date

8:30

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID # 2-70000716852

Gals.

32.000000
1,700

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name Allco Inc.

Permit No. 0316531

Address 2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title

Date

Time

REMARKS

7477

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602

PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617

(312) 743-4966

NO 1396

GENERATOR

HR Smith Paper Co.

[Signature]

3-30-82

8:30

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

ILD000716852

Gals.

30 DEUS
1,700

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Alburn Inc.

Permit No.

0316031

Address

2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

[Signature]
Signature of Operator and Title

Date

Time

3-30-82

9:10 AM

REMARKS

U-DORE

Manifest to

5/26/82

Incineration

7437

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273114

Authorization Number 9 9 2 9 3 3

H.P. Smith Paper Co.

(Company Name)

5001 W. 66th Street

Address

Chicago

City

Illinois

State

60638

Zip

0 3 1 6 0 0 0 2 4 6

Generator Number

312/458-0777

D & J Waste Refuse

Hauler Name

654 E 161st St S. Holland

Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1

Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc

(Facility Name)

119th Street

Address

Chicago, Ill

City

Illinois

State

Zip

0 3 1 6 0 0 0 3 1

Site Number

FED ID# ILLD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

E.P.A. Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400 LBS

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR D.O.T. USE 14,400 LBS
(circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0 0 1 7 0 0

1 GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 3/30/82

(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED.

(1)

(Authorized Signature)

(2)

(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE.

(Authorized Signature)

Permit Applied For

DATE: 3/30/82

COMMENTS OR SPECIAL INSTRUCTIONS

IN ILLINOIS: 217-782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800-742-88

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

SITE COPY - PART 3

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

OK

0273114
1 7

SPECIAL WASTE HAULING MANIFEST

Authorization Number 9 9 2 9 3 3
8 13

H.P. Smith Paper Co.
(Company Name)

5001 W. 66th Street

Address

Chicago

City

Illinois

State

60638

Zip

0 3 1 6 0 0 0 2 4 6 6
14 Generator Number 24

312/458-0777

D & J Waste Refuse
Hauler Name

654 E 161st St S. Holland m
Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1
25 31

Hauler Name

Hauler Address

S.W.H. Registration Number 32 38

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc

(Facility Name)

119th Street

Address

Chicago, Ill

City

Illinois

State

Zip

0 3 1 6 0 0 3 1
39 Site Number 49

FED ID# LLD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

E.P.A. Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

14,400 LBS

WEIGHT FOR 14,400 LBS
D.O.T. USE (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0 0 1 7 0 0
47 52

1 GALLONS (Circle One)
2 CU. YDS. 33

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 3/30/82

(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) (Authorized Signature)

DATE: 03/30/82

(2) (Authorized Signature)

DATE: / /

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

(Authorized Signature)

Permit Applied For

DATE: 3/30/82

COMMENTS OR SPECIAL INSTRUCTIONS:

7478

ILLINOIS 217/782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800/424-8802

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

ASTURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4986

119 1108

GENERATOR

H.P. Smith Pump Co.

Richard D. Smith

4-22-88

8:15

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID # 0-180001-16

Gals

1700

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

W. H. Smith

Permit No.

316001

Address

2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

W. H. Smith

4-28-88

8:55

Signature of Operator and Title

Date

Time

REMARKS

3 drums waste oil

2 drums waste oil

1 drum waste oil

00646

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273116

Authorization Number 992933

H.P. Smith Paper Co 5001 West 66th Street
(Company Name) Address
Chicago Illinois 60638
City State Zip

03160002460
Generator Number

D & J Waste Refuse 654 E 161st St S. Highland Ill.
Hauler Name Hauler Address

S.W.H. Registration Number 0868001

Hauler Name Hauler Address S.W.H. Registration Number

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

B & Alburn Inc 119th Street
(Facility Name) Address
Chicago, IL Illinois 60638
City State Zip

031600031
Site Number

FED ID# ILL000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N. O. S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

E. P. A. Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400 LBS

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N. O. S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE 14,400 LBS (circle one)
PONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL

QUANTITY OF WASTE DELIVERED: 001700

1 GALLONS (circle one)
GAL. (circle one)
GAL. (circle one)

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION:

DATE: 1/28/82

Latisha L. Lewis
(Authorized Signature)

WASTE HAULER

RECEIVED

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) Richard D. Foster
(Authorized Signature)

FEB 3 1983

DATE: 1/28/82

(2) Latisha L. Lewis
(Authorized Signature)

DATE: 1/28/82

DISPOSAL, STORAGE, OR TREATMENT FACILITY:

ATTORNEY GENERAL

SUBJECT TO FEE YES NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

Latisha L. Lewis
(Authorized Signature)

Permit Applied For

DATE: 1/28/82

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

SITE COPY - PART 3

00647

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

32 drums

ZIP 1193

GENERATOR

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

Gals.

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Permit No.

Address

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title

Date

Time

REMARKS

3 Drums mixed oil

29 Drums mixed solvent

7479

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

No. 1438

GENERATOR

H.P. Smith Paper Co.

Richard R. Smith
Signature of Generator's Agent and Title

4-28-82

Date

8:15

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

0316000246

Gals.

1700

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Alburn Inc.

Permit No.

03160031

Address

2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

William P. Ballinger
Signature of Operator and Title

4-28-82

Date

8:55

Time

REMARKS

3 Drums waste oil
29 Drums mixed solvent

7439

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273116

Authorization Number 992933

H.P. Smith Paper Co
(Company Name)

5001 West 66th Street

Address

Chicago

City

Illinois

State

60638

Zip

0316000246
Generator Number

WASTE HAULER(S)

D & J Waste Refuse

Hauler Name

654 E 161st St S. Holland Ill.

Hauler Address

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

S.W.H. Registration Number 32 38

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

B & Alburn Inc

(Facility Name)

119th Street

Address

Chicago, IL

City

Illinois

State

Zip

03160031
Site Number

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N. O. S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

E. P. A. Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N. O. S.

Flammable Liquid

14,400 LBS

WEIGHT FOR D.O.T. USE 14,400 LBS
(circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0 0 1 7 0 0

1 - GALLONS (circle one)
2 - CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 1/28/82

(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) (Authorized Signature)

FEB 3 1982

DATE: 1/28/82

(2) (Authorized Signature)

DATE: 1/28/82

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

ATTORNEY GENERAL

WASTE SUBJECT TO FEE YES NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

Permit Applied For

DATE: 1/28/82

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

SITE COPY - PART 3

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4968

NO. 1504

GENERATOR

H. P. Smith Paper Co.

5901 West 66th St.
Chicago, Ill. 60635

Richard D. Rota - D.J.
Signature of Generator's Agent and Title

5/25/82

Date

7:30 A.M.
Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID# 0316000246

Gals. 1760

FLAMMABLE LIQUIDS

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

03160031

Name ALBURN, Inc.

Signature

Permit No.

Address 2200 East 119th St., Chicago, Ill.

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Richard D. Rota - D.J.
Signature of Operator and Title

5/25/82

Date

8:30 A.M.
Time

REMARKS

924

DOC 12

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760

SPECIAL WASTE HAULING MANIFEST

Authorization Number 992933

0273117

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

Address

Chicago

City

Illinois

State

60638

Zip

031 600 02 46 6

Generator Number

WASTE HAULER(S)

D & J WASTE SERVICE B
Hauler Name

654 R 161st St SOUTH HOLLAND IL
Hauler Address

S.W.H. Registration Number 08 68 001

Hauler Name

Hauler Address

S.W.H. Registration Number 32

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

ALBURN INC.

(Facility Name)

119th Street

Address

CHICAGO

City

ILLINOIS

State

Zip

031 60 031

Site Number

FED ID# ILL000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: SOLVENT N.O.S.

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

E.P.A. WASTE NO DO01

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400lbs

SHIPPING DESCRIPTION:

HAZARD CLASS:

SOLVENT N.O.S.

FLAMMABLE LIQUID

WEIGHT FOR
D.O.T. USE

14,400

14,400 LBS
(circle one)
TUNS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 001760

0 GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION.

DATE: 5/25/82

Edward J. McE...
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORTATION AND I KNOWLEDGE THE DESTINATION AS INDICATED.

Richard D. DePietro
(Authorized Signature)

(2) Richard D. DePietro
(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY

HAZARDOUS WASTE SUBJECT TO FEE YES ☐ NO ☒

I HEREBY CERTIFY THAT THE ABOVE DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

Robert B. Lirchow, R. Mgr
(Authorized Signature)

PERMIT APPLIED FOR

DATE: 5/25/82

COMMENTS OR SPECIAL INSTRUCTIONS

(22) --- 55 GAL DRUMS OF SOLVENT (HOT)

IN ILLINOIS: 217/782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800/424-8892

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

00643

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

Nº 1504

GENERATOR

H. P. Smith PAPER CO.

5200 WEST 66TH ST.
CHICAGO, ILL. 60638

Signature of Generator's Agent and Title
R. J. Smith - D + J

Date

Time

5/25/82 8:30 AM

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID# 0316000246

Gals. 1760

FLAMMABLE LIQUIDS

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name ALBURN INC.

Permit No.

03160021

Address 2200 EAST 119TH ST., CHICAGO, ILL.

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title
R. J. Smith - D + J

Date

Time

5/25/82 8:30 AM

REMARKS

7476

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

No. 1504

GENERATOR

H. P. SMITH PAPER CO., 5001 WEST 66TH ST., CHICAGO, ILL. 60638

Richard D. Latta - D+J
Signature of Generator's Agent and Title

5/25/82

Date

8:30 AM

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID# 0316000246

Gals. 1760

FLAMMABLE LIQUIDS

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

03160031

Name ALBURN INC.

Site

Permit No.

Address 2200 EAST 119TH ST., CHICAGO, ILL.

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Robert E. Litchman Jr. Mgr.
Signature of Operator and Title

5/25/82

Date

8:30 AM

Time

REMARKS

37 - 1124

7491

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273117

H.P. Smith Paper Co.
(Company Name)

5001 West 66th Street

Address

Chicago

City

Illinois

State

60638

Zip

Authorization Number 992933

0316000246
Generator Number

D & J WASTE REFUSE R
Hauler Name

654 E 161st St SOUTH HOLLAND IL
Hauler Address

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

S.W.H. Registration Number 32

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

ALBURN INC.

(Facility Name)

119th Street

Address

03160031
Site Number

CHICAGO

City

ILLINOIS

State

Zip

FED ID# ILLD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: SOLVENT N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

E.P.A. WASTE NO D001

14,400lbs

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

SOLVENT N.O.S.

FLAMMABLE LIQUIDS

WEIGHT FOR D.O.T. USE: 14,400 LBS
(circle one)

WEIGHT FOR E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL

QUANTITY OF WASTE DELIVERED: 001760

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION,
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 5/25/82

Edward M. [Signature]
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I KNOWLEDGE THE DESTINATION AS
INDICATED

(1) Richard D. [Signature]
(Authorized Signature)

(2) [Signature]
(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES NO ☒

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

Robert C. [Signature]
(Authorized Signature)

PERMIT APPLIED FOR

DATE: 5/25/82

COMMENTS OR SPECIAL INSTRUCTIONS: (??) --- 55 GAL DRUMS OF SOLVENT (HOT)

7492

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

IN ILLINOIS: 217 / 782-3637

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART - 6 GENERATOR

SITE COPY - PART 3

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

No. 1723

GENERATOR

H. P. Smith Paper Co.

Sam Neenath

10-20-82

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

TL0005126423

Gals.

1760

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Albourn Inc.

Permit No.

03/60031

Address

2200 E 117th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

William Collins

10-20-82

Signature of Operator and Title

Date

Time

REMARKS

0 % Cl

17,467 BTU's

1.02 % ash

00655

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0661756

Authorization Number 992933

H.P. Smith Paper Co.

5001 W 66th Street

3124580717

03160002463

(Company Name)

Address

Phone Number

Generator Number

Chicago

Ill

60638

ILL0005120423

City

State

Zip

EPA Number

WASTE HAULER(S)

D & J Waste Refuse

160 E 168th St South Holland Ill

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

3123315171

ILT180011397

Phone Number

EPA Number

Hauler Name

Hauler Address

Phone Number

EPA Number

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc

2200 E 119th Street

031600031

(Facility Name)

Address

Site Number

Chicago, Ill

Ill

Zip

Phone Number

ILL0000716852

City

State

Zip

Phone Number

EPA Number

Alternate (Facility Name)

Address

39 Site Number 40

City

State

Zip

Phone Number

EPA Number

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.B.S.

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

NA1993

D001

UN or NA Number

EPA HWY Number

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
B.O.T. USE 11,400

LBS
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 001760

47 52 53
GALLONS (Circle One)
CU. YDS.

METHOD OF SHIPMENT (Circle One)

(DRUMS 32)
Number

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION.
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

William Collins
(Authorized Signature)

DATE: 10/20/82

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE
THE DESTINATION AS INDICATED:

(1) Sam Heemstra
(Authorized Signature)

FEB 3 1983

DATE: 10/20/82

(2) _____
(Authorized Signature)

ATTORNEY GENERAL

DATE: 10/20/82

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

HAZARDOUS WASTE SUBJECT TO FEE YES NO X

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE.

William Collins
(Authorized Signature)

DATE: 10/20/82

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2575

DISTRIBUTION - PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

REV. 4-4

SITE COPY - PART 3

00656

no man

ALBURN, Inc.

32 drums

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

No 1723

GENERATOR

H. P. Smith

Gen. Manager

Signature of Generator's Agent and Title

10-20-87

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

TLH005120423

Gals.

1760

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Albion Inc.

Permit No.

116021

Address

2200 E 119th

☒ Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

William Collins

Signature of Operator and Title

10-20-87

Date

Time

REMARKS

0 % Cl
17467 BTG5
lb
1.02 % ash

7475

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON ST., CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 119TH ST., CHICAGO, ILLINOIS 60617
(312) 743-4966

No. 1723

GENERATOR

H. P. Smith Paper Co.

Sam Hemstra

10-20-82

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID# 7LD005120423 Gals. 1760

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name Alburn inc. Permit No. 03160031

Address 2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

William Collins Chan

10-20-82

Signature of Operator and Title

Date

Time

REMARKS

0 % Cl

17,467 Btu's
lb

1.02 % ash

526

7497

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0661756

Authorization Number 992933
8 13

P. Smith Paper Co. 5001 W 66th Street 3124580777 03160002466
(Company Name) Address Phone Number Generator Number
Chicago **Ill** **60638** **IL D005120423**
City State Zip EPA Number
WASTE HAULER(S)

D & J Waste Refuse 160 E 168th St South Holland IL 0868001
Hauler Name Hauler Address S.W.H. Registration Number 25 31
3123315171 ILL180011397
Hauler Name Hauler Address S.W.H. Registration Number 32 38
Phone Number EPA Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE
Alburn Inc 2200 E 119th Street 031600031
(Facility Name) Address 39 Site Number 46
Chicago, Ill **Ill** **IL D000716852**
City State Zip Phone Number EPA Number
Alternate (Facility Name) Address 39 Site Number 46
City State Zip Phone Number EPA Number

TO BE COMPLETED BY
WASTE GENERATOR
WASTE NAME: **Solvent N.B.S.** WASTE PHASE: **Liquid**
(Liquid, Gaseous, Solid)
THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:
SHIPPING DESCRIPTION: **Solvent N.O.S.** HAZARD CLASS: **Flammable Liquid** **NA 1993** **D001**
UN or NA Number EPA HW Number
WEIGHT FOR 11,400 LBS. TONS (circle one) WEIGHT FOR I.E.P.A. USE MUST BE QUANTITY OF WASTE DELIVERED: 001760 2 CU. YDS. (Circle One)
O.D.T. USE TONS (circle one) CONVERTED TO CU. YDS. OR GAL. 47 52 53
METHOD OF SHIPMENT (Circle One) (DRUMS 32) TANK TRUCK OPEN TRUCK OTHER (Specify) Number

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION,
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.
I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION *Deva...* DATE: 10/20/82
(Authorized Signature)

WASTE HAULER I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE
THE DESTINATION AS INDICATED:
(1) *Jim Heemstra* DATE: 10/20/82
(Authorized Signature) 54 59
(2) DATE: / /
(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY* HAZARDOUS WASTE SUBJECT TO FEE YES NO X
I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:
William Collins DATE: 10/30/82
(Authorized Signature) 60 65

COMMENTS OR SPECIAL INSTRUCTIONS: 7498

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273120

Authorization Number 9 9 2 9 33

N.P. Smith Paper Co
(Company Name)

5001 w. 66th Street
Address

Chicago, Ill
City

Illinois
State

60638
Zip

0 3 1 6 0 0 0 2 4 6 G
Generator Number

D & J Waste Refuse
Hauler Name

654 e 161st South Holland Ill
Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1

Hauler Name

Hauler Address

S.W.H. Registration Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc
(Facility Name)

2200 E. 119 th Street
Address

0 3 1 6 0 0 3 1
Site Number

Chicago
City

Ill
State

Zip

FED ID# ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

E.P.A. Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE 14,400
LBS
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL

QUANTITY OF WASTE DELIVERED: 0 0 1 7 6 0

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION,
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 6-23-82

(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED

(1) David V. Anderson
(Authorized Signature)

(2) _____
(Authorized Signature)

DATE: 6/23/82

DATE: _____

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE

(Authorized Signature)

Permit Applied For

DATE: 6/23/82

SPECIAL INSTRUCTIONS:

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800/747-8802

WATER

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 11 CHICAGO, ILLINOIS 60617
(312) 743-4966

No 1569

GENERATOR

H. P. Smith Paperco

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID# 031600246 Gals. 1760
Solvent N.O.S.

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Alburn Inc

Permit No.

03160031

Address

2200 E 119th

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title

Date

Time

REMARKS

32 Drums

41.2% Cl

32 x ~~41.2%~~ \$32 = \$1184.00

7493

525

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706
(217) 782-6760
SPECIAL WASTE HAULING MANIFEST

0273120

Authorization Number 992933

M.P. Smith Paper Co
(Company Name)

5001 w. 66th Street

Address

Chicago, Ill

Illinois

60638

City

State

Zip

03160002466
Generator Number

D & J Waste Refuse

Hauler Name

654 e 161st South Holland Ill

Hauler Address

S.W.H. Registration Number 0868001

Hauler Name

Hauler Address

S.W.H. Registration Number 32 38

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

Alburn Inc

(Facility Name)

3700 E. 119 th Street

Address

Chicago

City

Ill

State

Zip

031600031
Site Number

FED ID#ILD000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

E.P.A. Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

WEIGHT FOR
D.O.T. USE 14,400

SS
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 001760

1 GALLONS (Circle One)
2 CU. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION:

DATE: 6-23-82

Edward M. [Signature]
(Authorized Signature)

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED.

(1) David V. [Signature]
(Authorized Signature)

(2) [Signature]
(Authorized Signature)

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE.

[Signature]
(Authorized Signature)

Permit Applied For

DATE: 6-23-82

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 EPA

PART - 6 GENERATOR

00645

ALBURN, Inc.

OFFICE: 111 W. WASHINGTON CHICAGO, ILLINOIS 60602
PLANT: 2200 EAST 11 CHICAGO, ILLINOIS 60617
(312) 743-4966

NY 1589

GENERATOR

Signature of Generator's Agent and Title

Date

Time

DESCRIPTION OF MATERIAL &/OR WORK

Stream ID #

Gals.

I certify that the described liquid waste was hauled in a vehicle with a valid liquid waste registration certificate to the facility named below.

DISPOSITION

Name

Permit No.

Address

Incineration

Other

I certify that the above named contractor delivered the described liquid waste to this facility.

Signature of Operator and Title

Date

Time

REMARKS

32 Drums

41.2% Cl

32 x 32 = 1024

00644

gabriel and associates

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

April 30, 1981

Mr. Dale DeValk
D & J Waste Refuse Disposal
160 East 168th Street
South Holland, IL 60473

Laboratory No: 2055-81

Dear Mr. DeValk:

Listed below are the analyses of material submitted to Gabriel for analytical testing according to Alburn requirements.

<u>Analysis</u>	<u>Result</u>
Gross BTU/lb.	19,660
Total Sulfur	< 50 ppm
Organic Chlorine	< 35 ppm
Water by Distillation	90 % *
Ash	7600 (0.76%)
PCB (ppm)	< 2 ppm
Mercury (ppb)	2.0
Lead (ppm)	4.0 ppm
Flash Point	< 40°F
Karl Fischer Moisture	0.3%

*This figure is an error as alcohol distills across as water by this method.
Correct moisture is given by the Karl Fischer Method.

If there are any questions, please call at once.

Sincerely,

Mike Gower

Mike Gower

Technical Services Representative

Gabriel and Associates

8339

MG/js

001123

gabriel and associates

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

April 30, 1981

Mr. Jim Eldert
Alburn, Inc.
111 W. Washington St.
Chicago, IL 60602

Dear Mr. Eldert:

Gabriel has analyzed a waste stream brought to us by Mr. Dale DeValk owner of D & J Waste Refuse Disposal, 160 East 168th Street, South Holland, IL 60473. The waste is an alcohol which has a BTU of 19,660. The entire lab analysis is attached.

Mr. DeValk would like to have this material permitted to Alburn. He will give you all the details regarding the generator's EPA number, etc. at his office, 331-5171.

Please call me if there are any questions regarding the analysis.

Sincerely yours,

Mike Gower

Mike Gower
Technical Services Representative

Gabriel and Associates

MG/js

enc.

001122

0 8338

gabriel and associates

environmental consultants

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

April 30, 1981

H.P. Smith Paper Co.

Mr. Jim Eldert
Alburn, Inc.
111 W. Washington St.
Chicago, IL 60602

Dear Mr. Eldert:

Gabriel has analyzed a waste stream brought to us by Mr. Dale DeValk owner of D & J Waste Refuse Disposal, 160 East 168th Street, South Holland, IL 60473. The waste is an alcohol which has a BTU of 19,660. The entire lab analysis is attached.

Mr. DeValk would like to have this material permitted to Alburn. He will give you all the details regarding the generator's EPA number, etc. at his office, 331-5171.

Please call me if there are any questions regarding the analysis.

Sincerely yours,

Mike Gower

Mike Gower
Technical Services Representative

Gabriel and Associates

MG/js

enc.

001121

7466

April 30, 1981

Mr. Dale DeValk
D & J Waste Refuse Disposal
160 East 168th Street
South Holland, IL 60473

Laboratory No: 2055-81

Dear Mr. DeValk:

Listed below are the analyses of material submitted to Gabriel for analytical testing according to Alburn requirements.

<u>Analysis</u>	<u>Result</u>
Gross BTU/lb.	19,660
Total Sulfur	< 50 ppm
Organic Chlorine	< 35 ppm
Water by Distillation	90 % *
Ash	7600 (0.76%)
PCB (ppm)	< 2 ppm
Mercury (ppb)	2.0
Lead (ppm)	4.0 ppm
Flash Point	< 40°F
Karl Fischer Moisture	0.3%

*This figure is an error as alcohol distills across as water by this method.
Correct moisture is given by the Karl Fischer Method.

If there are any questions, please call at once.

Sincerely,

Mike Gower

Mike Gower

Technical Services Representative

Gabriel and Associates

001115

MG/js

7461

Gabriel and associates

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

April 30, 1981

Mr. Dale DeValk
D & J Waste Refuse Disposal
160 East 168th Street
South Holland, IL 60473

Laboratory No: 2055-81

Dear Mr. DeValk:

Listed below are the analyses of material submitted to Gabriel for analytical testing according to Alburn requirements.

<u>Analysis</u>	<u>Result</u>
Gross BTU/lb.	19,660
Total Sulfur	<50 ppm
Organic Chlorine	<35 ppm
Water by Distillation	90 % *
Ash	7600 (0.76%)
PCB (ppm)	< 2 ppm
Mercury (ppb)	2.0
Lead (ppm)	4.0 ppm
Flash Point	< 40°F
Karl Fischer Moisture	0.3%

*This figure is an error as alcohol distills across as water by this method.
Correct moisture is given by the Karl Fischer Method.

If there are any questions, please call at once.

Sincerely,

Mike Gower

Mike Gower

Technical Services Representative

Gabriel and Associates

7459

MG/js

0311

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL
SPECIAL WASTE DISPOSAL APPLICATION

CAL TYPE DATE 5/14/81 L P S W C AUTHORIZATION NUMBER 790650 TRANS CODE 13 DATE ENTERED (Agency Use) 15 16 17 18 19 20

HAULER REGISTRATION NUMBER 0868 NAME D. & J WASTE REFUSE DISPOSAL
ADDRESS 160 East 168th St. COMMUNITY South Holland
COUNTY Cook STATE IL ZIP 60473 AREA CODE 312 TELEPHONE 3315171

WASTE GENERATOR USEPA ID Number ILD 074411745
GENERATOR CODE * NAME H. P. SMITH PAPER CO.
ADDRESS 5001 West 66th Street COMMUNITY Bedford Park
COUNTY Cook STATE IL ZIP 60638 AREA CODE 312 TELEPHONE 4580777
GENERATOR CONTACT NAME JOHN SULLIVAN
DUNS NUMBER 2641 SIC CODE 2641

PROCESS NAME LAMINATING

WASTE CHARACTERISTICS
GENERIC WASTE NAME WASTE SOLVENTS
IUPAC WASTE NAME
TOTAL ANNUAL WASTE VOLUME 100000 VOLUME UNITS 2 WASTE PHASE 3
TRANSPORT FREQUENCY 5 WASTE CLASS (Agency Use) 64 65
1 = ONE TIME 5 = MONTHLY 1 = CUBIC YARDS 1 = SOLID
2 = DAILY 6 = BI-MONTHLY 2 = GALLONS 2 = SEMI-SOLID
3 = WEEKLY 7 = QUARTERLY 3 = LIQUID
4 = BI-WEEKLY 8 = SEMI-ANNUALLY 4 = GAS

(Code either "1" for Low, "2" for Medium, or "3" for High as appropriate for columns 21 through 26):

INHALATION TOXICITY 21 DERMAL TOXICITY 22 INGESTIVE TOXICITY 23 INFECTIOUS 24 REACTIVITY 25 EXPLOSIVE 26
FLASH POINT 27 ALPHA RADIATION 31 COMPOSITION 37
1 = ORGANIC
2 = INORGANIC

PERCENT ACIDITY 38 PERCENT ALKALINITY 41 pH 43 PERCENT TOTAL SOLIDS 47 PERCENT ASH CONTENT 52
KEY COMPONENT NAME PERCENT KEY COMPONENT NAME PERCENT

1 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

Applied for herein
Refer to attached analyses.

7465

00120

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL
SPECIAL WASTE DISPOSAL APPLICATION

CARD
TYPE

DATE 5/14/81 L P S W C AUTHORIZATION NUMBER

TRANS
CODE

DATE ENTERED
(Agency Use)

WASTE HAULER USEPA ID Number ILT 180011397

HAULER REGISTRATION NUMBER 0 8 6 8 NAME

D. & J WASTE REFUSE DISPOSAL

ADDRESS 160 East 168th St.

COMMUNITY South Holland

COUNTY Cook STATE IL ZIP 60473 AREA CODE 312 TELEPHONE 3315171

WASTE GENERATOR USEPA ID Number ILD 074411745

GENERATOR
CODE

G NAME

H. P. SMITH PAPER CO.

ADDRESS 5001 West 66th Street

COMMUNITY Bedford Park

COUNTY Cook STATE IL ZIP 60638 AREA CODE 312 TELEPHONE 4580777

GENERATOR CONTACT NAME J O H N S U L L I V A N

DUNS NUMBER SIC CODE 2641

PROCESS NAME L A M I N A T I N G

WASTE CHARACTERISTICS

GENERIC WASTE NAME W A S T E S O L V E N T S

IUPAC WASTE NAME

TOTAL ANNUAL WASTE VOLUME 1 0 0 0 0 0

VOLUME UNITS 2

WASTE PHASE 3

TRANSPORT FREQUENCY 5

WASTE CLASS
(Agency Use)

1 = CUBIC YARDS
2 = GALLONS

1 = SOLID
2 = SEMI-SOLID
3 = LIQUID
4 = GAS

1 = ONE TIME
2 = DAILY
3 = WEEKLY
4 = BI-WEEKLY
5 = MONTHLY
6 = BI-MONTHLY
7 = QUARTERLY
8 = SEMI-ANNUALLY

(Code either "1" for Low, "2" for Medium, or "3" for High as appropriate for columns 21 through 26):

INHALATION
TOXICITY

DERMAL
TOXICITY

INGESTIVE
TOXICITY

INFECTIOUS

REACTIVITY

EXPLOSIVE

FLASH POINT

°F

ALPHA RADIATION

(pCi/L)

COMPOSITION

1 = ORGANIC
2 = INORGANIC

PERCENT
ACIDITY

PERCENT
ALKALINITY

pH

PERCENT
TOTAL
SOLIDS

PERCENT
ASH CONTENT

KEY COMPONENT NAME

PERCENT

KEY COMPONENT NAME

PERCENT

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100

* Applied for herein

Refer to attached analyses.

001126

7458

ALBURN, Inc.

GENERAL OFFICE
111 W. WASHINGTON STREET
CHICAGO, ILLINOIS 60602

JULIA M. HAGERTY
PRESIDENT

EUGENE DOONER MURPHY
EXECUTIVE VICE-PRESIDENT

(312) 236-2951

May 14, 1981

Mr. Rama K. Chaturvedi, P.E.
Manager, Special Waste Unit
Residual Management Section
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Special Waste Disposal Application
H. P. Smith Paper Co.
Bedford Park, IL

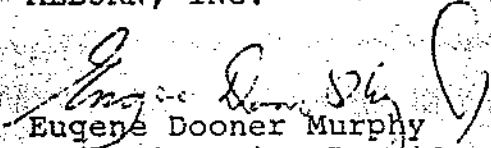
Dear Mr. Chaturvedi:

Enclosed find five copies, with attachments, of application for the above referenced generator. Please assign a Generator Code to this generator.

Please note that the result of the analysis for water content, shown on the attached Lab report from Gabriel and Associates, is an error. As soon as we receive the corrected analysis, we will forward same to you. The correct moisture should be 0.3%.

Yours very truly,

ALBURN, INC.


Eugene Dooner Murphy
Executive Vice President

EDM:jm
Encs.

cc: James Cobb
James H. Eldert
Richard J. Trzupek

7463

001118

2/18/93 mem.
Birth lists
De

7462

April 30, 1981

Mr. Dale DeValk
D & J Waste Refuse Disposal
160 East 168th Street
South Holland, IL 60473

Laboratory No: 2055-81

Dear Mr. DeValk:

Listed below are the analyses of material submitted to Gabriel for analytical testing according to Alburn requirements.

<u>Analysis</u>	<u>Result</u>
Gross BTU/lb.	19,660
Total Sulfur	< 50 ppm
Organic Chlorine	< 35 ppm
Water by Distillation	90 % *
Ash	7600 (0.76%)
PCB (ppm)	< 2 ppm
Mercury (ppb)	2.0
Lead (ppm)	4.0 ppm
Flash Point	< 40°F
Karl Fischer Moisture	0.3%

*This figure is an error as alcohol distills across as water by this method.
Correct moisture is given by the Karl Fischer Method.

If there are any questions, please call at once.

Sincerely,

Mike Gower

Mike Gower
Technical Services Representative

Gabriel and Associates

MG/js

002595

CARD TYPE DATE 5/14/81 L P S W C AUTHORIZATION NUMBER 8 13 14 TRANS CODE DATE ENTERED (Agency Use) 15 16 / 17 18 / 19 20

WASTE CHARACTERISTICS

METAL KEY	TOTAL	(PPM)	LEACH	(PPM)	METAL KEY	TOTAL	(PPM)	LEACH	(PPM)
CN	0 1	21	30 31	38	Cu	0 2	39 41	48 49	56
Ag	0 3				Hg	0 4			
As	0 5				Ni	0 6			
Ba	0 7				Pb	0 8			
Cd	0 9				Se	1 0			
Cr	1 1				Zn	1 2			

LABORATORY NAME 21 40
CERTIFICATION NUMBER 41 60 REVIEWED BY: 51 53 / 54 56

1 21 SITE CODE 0 3 1 6 0 0 3 1 SITE NAME ALBURN, INC.
DISPOSAL METHOD 1 6 NEUTRALIZATION METHOD 32 33 USEPA ID # ILD 000716852
STATUS START DATE 34 35 36 / 37 38 / 39 40 EXPIRATION DATE 41 42 / 43 44 / 45 46
SIGNATURE ALBURN, INC. (SITE OWNER) SIGNATURE ALBURN, INC. (SITE OPERATOR)

2 21 By: [Signature] (SITE OWNER) By: [Signature] (SITE OPERATOR)
SITE CODE 22 29 SITE NAME 30 31
DISPOSAL METHOD 32 33 NEUTRALIZATION METHOD 34 35
STATUS START DATE 36 37 / 38 39 / 40 41 EXPIRATION DATE 42 43 / 44 45 / 46 47
SIGNATURE (SITE OWNER) SIGNATURE (SITE OPERATOR)

3 21 SITE CODE 22 29 SITE NAME 30 31
DISPOSAL METHOD 32 33 NEUTRALIZATION METHOD 34 35
STATUS START DATE 36 37 / 38 39 / 40 41 EXPIRATION DATE 42 43 / 44 45 / 46 47
SIGNATURE (SITE OWNER) SIGNATURE (SITE OPERATOR)

4 21 SITE CODE 22 29 SITE NAME 30 31
DISPOSAL METHOD 32 33 NEUTRALIZATION METHOD 34 35
STATUS START DATE 36 37 / 38 39 / 40 41 EXPIRATION DATE 42 43 / 44 45 / 46 47
SIGNATURE (SITE OWNER) SIGNATURE (SITE OPERATOR)

5 21 SITE CODE 22 29 SITE NAME 30 31
DISPOSAL METHOD 32 33 NEUTRALIZATION METHOD 34 35
STATUS START DATE 36 37 / 38 39 / 40 41 EXPIRATION DATE 42 43 / 44 45 / 46 47
SIGNATURE (SITE OWNER) SIGNATURE (SITE OPERATOR)

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL
SPECIAL WASTE DISPOSAL APPLICATION

CARD TYPE DATE 5/14/81 L P S W C AUTHORIZATION NUMBER TRANS CODE 14 DATE ENTERED (Agency Use) 15 / 16 / 19 20

HAULER REGISTRATION NUMBER 0 8 6 8 NAME D. & J WASTE REFUSE DISPOSAL
ADDRESS 160 East 168th St. COMMUNITY South Holland
COUNTY Cook STATE IL ZIP 60473 AREA CODE 312 TELEPHONE 3315171

WASTE GENERATOR USEPA ID Number ILD 074411745
GENERATOR CODE * G. NAME H. P. SMITH PAPER CO.
ADDRESS 5001 West 66th Street COMMUNITY Bedford Park
COUNTY Cook STATE IL ZIP 60638 AREA CODE 312 TELEPHONE 4580777
GENERATOR CONTACT NAME J O H N S U L L I V A N
DUNS NUMBER SIC CODE 2641

PROCESS NAME L A M I N A T I N G

WASTE CHARACTERISTICS
GENERIC WASTE NAME W A S T E S O L V E N T S

IUPAC WASTE NAME
TOTAL ANNUAL WASTE VOLUME 1 0 0 0 0 0 VOLUME UNITS 2 WASTE PHASE 3
TRANSPORT FREQUENCY 5 WASTE CLASS (Agency Use) 64 65
1 = ONE TIME 5 = MONTHLY 1 = CUBIC YARDS 1 = SOLID
2 = DAILY 6 = BI-MONTHLY 2 = GALLONS 2 = SEMI-SOLID
3 = WEEKLY 7 = QUARTERLY 3 = LIQUID
4 = BI-WEEKLY 8 = SEMI-ANNUALLY 4 = GAS

(Code either "1" for Low, "2" for Medium, or "3" for High as appropriate for columns 21 through 26):

INHALATION TOXICITY 21 DERMAL TOXICITY 22 INGESTIVE TOXICITY 23 INFECTIOUS 24 REACTIVITY 25 EXPLOSIVE 26
FLASH POINT 27 OF ALPHA RADIATION 31 (pCi/L) COMPOSITION 37
1 = ORGANIC
2 = INORGANIC

PERCENT ACIDITY 38 PERCENT ALKALINITY 41 PH 44 PERCENT TOTAL SOLIDS 47 PERCENT ASH CONTENT 52
KEY COMPONENT NAME PERCENT KEY COMPONENT NAME PERCENT
1 21 22 43 44 47 48 49 70 71 74
3 21 22 43 44 47 48 49 70 71 74
5 21 22 43 44 47 48 49 70 71 74

* Applied for herein

Refer to attached analyses.

002593

ALBURN, Inc.

GENERAL OFFICE
111 W. WASHINGTON STREET
CHICAGO, ILLINOIS 60602

JULIA M. HAGERTY
PRESIDENT

EUGENE DOONER MURPHY
EXECUTIVE VICE-PRESIDENT

(312) 236-2951

May 14, 1981

Mr. Rama K. Chaturvedi, P.E.
Manager, Special Waste Unit
Residual Management Section
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Special Waste Disposal Application
H. P. Smith Paper Co.
Bedford Park, IL

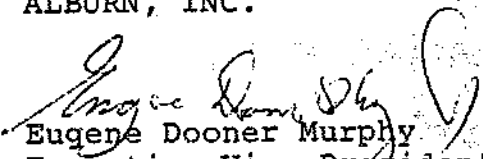
Dear Mr. Chaturvedi:

Enclosed find five copies, with attachments, of application for the above referenced generator. Please assign a Generator Code to this generator.

Please note that the result of the analysis for water content, shown on the attached Lab report from Gabriel and Associates, is an error. As soon as we receive the corrected analysis, we will forward same to you. The correct moisture should be 0.3%.

Yours very truly,

ALBURN, INC.


Eugene Dooner Murphy
Executive Vice President

EDM:jm
Encs.

cc: James Cobb
James H. Eldert
Richard J. Trzupek ✓

002592

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120687

Authorization Number 790650

Smith Paper Co.
(Company Name)
Chicago
City

5001 West 66th Street
Address
Illinois
State
60638
Zip

EPA ID NO ILD000716852
0316000246
Generator Number

WASTE HAULER(S)

(1) D & J Waste Refuse
Hauler Name
654 E 161st St
South Holland
Hauler Address
Illinois

S.W.H. Registration Number 0668-001

(2) _____
Hauler Name
_____ Hauler Address

S.W.H. Registration Number _____

DESTINATION - DISPOSAL STORAGE OR TREATMENT SITE

~~Alburt Inc~~
ALBURN INC
(Facility Name)
119th Street
Address
Chicago
City
Illinois
State
Zip

03160031
Site Number

ILD 000716852

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

EPA Waste No.D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

HAZARD CLASS: 14,400 LBS

SHIPPING DESCRIPTION:

Solvent N.O.S

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION, IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 5/27/81

Edward M. Leach
(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED 0 0 1 7 6 0

1 GALLONS (Circle One)
CO. YDS.

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER _____ (Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) _____
(Authorized Signature)

DATE: 5/27/81

(2) _____
(Authorized Signature)

DATE: ____/____/____

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

Permit# Applied For 5,27,81
DATE: 5/27/81

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

SITE COPY - PART 3

002591

TO BE COMPLETED BY
WASTE GENERATOR

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
SPECIAL WASTE HAULING MANIFEST
WASTE GENERATOR

0120688
1 7

Authorization Number 79 0 6 5 0
8 13

H.P. Smith Paper Co.

(Company Name)

5001 West 66th Street

Address

Chicago, Illinois.

City

Illinois.

State

Zip

EPA ID NO ILD00716852

0 3 1 6 0 0 0 2 4 6
14 24

Generator Number

WASTE HAULER(S)

(1) D & J Waste Refuse

Hauler Name

654 E. 161 St ST
South Holland Illinois

Hauler Address

S.W.H. Registration Number 0 8 6 8 0 0 1
25 31

(2)

Hauler Name

Hauler Address

S.W.H. Registration Number
32 38

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

~~XXXXXX~~ ALBURN INC.

(Facility Name)

119th Street

Address

Chicago,

City

Illinois.

State

Zip

0 3 1 6 0 0 3 1
39 46

Site Number

TO BE COMPLETED BY
WASTE GENERATOR

WASTE NAME: Solvent N.O.S.

WASTE PHASE: Liquid
(Liquid, Gaseous, Solid)

~~XXXXXXXXXX~~

EPA Waste No. D001

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

14,400 LBS.

SHIPPING DESCRIPTION:

HAZARD CLASS:

Solvent N.O.S.

Flammable Liquid

THIS IS TO CERTIFY THAT THE ABOVE-NAMED SPECIAL WASTE IS PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION.
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

DATE: 6/25/81

Edward M. Baker
(Authorized Signature)

WASTE HAULER*

QUANTITY OF WASTE RECEIVED: 0 0 1 7 6 0
47 52

1 GALLONS
2 CU. YDS.
(Circle One)
53

METHOD OF SHIPMENT (Circle One)

DRUMS

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1)

[Signature]
(Authorized Signature)

DATE: 06 / 25 / 81
59

(2)

(Authorized Signature)

DATE: / /

DISPOSAL, STORAGE, OR TREATMENT FACILITY*

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED SPECIAL WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED:

James H. Edwards
(Authorized Signature)

Permit Applied For DATE 6/25/81
60 65

COMMENTS OR SPECIAL INSTRUCTIONS:

002590

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802

DISTRIBUTION: PART 1 GENERATOR PART 2 IEPA PART 3 SITE PART 4 HAULER PART 5 IEPA PART 6 GENERATOR

SITE COPY - PART 3

gabriel and associates

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

April 30, 1981

Mr. Dale DeValk
D & J Waste Refuse Disposal
160 East 168th Street
South Holland, IL 60473

Laboratory No: 2055-81

Dear Mr. DeValk:

Listed below are the analyses of material submitted to Gabriel for analytical testing according to Alburn requirements.

<u>Analysis</u>	<u>Result</u>
Gross BTU/lb.	19,660
Total Sulfur	< 50 ppm
Organic Chlorine	< 35 ppm
Water by Distillation	90 % *
Ash	7600 (0.76%)
PCB (ppm)	< 2 ppm
Mercury (ppb)	2.0
Lead (ppm)	4.0 ppm
Flash Point	< 40°F
Karl Fischer Moisture	0.3%

*This figure is an error as alcohol distills across as water by this method.
Correct moisture is given by the Karl Fischer Method.

If there are any questions, please call at once.

Sincerely,

Mike Gower

Mike Gower
Technical Services Representative

Gabriel and Associates

MG/js

002589

gabriel and associates

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

April 30, 1981

Mr. Jim Eldert
Alburn, Inc.
111 W. Washington St.
Chicago, IL 60602

Dear Mr. Eldert:

Gabriel has analyzed a waste stream brought to us by Mr. Dale DeValk owner of D & J Waste Refuse Disposal, 160 East 168th Street, South Holland, IL 60473. The waste is an alcohol which has a BTU of 19,660. The entire lab analysis is attached.

Mr. DeValk would like to have this material permitted to Alburn. He will give you all the details regarding the generator's EPA number, etc. at his office, 331-5171.

Please call me if there are any questions regarding the analysis.

Sincerely yours,

Mike Gower

Mike Gower
Technical Services Representative

Gabriel and Associates

MG/js
enc.

002588

gabriel and associates

environmental consultants

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

April 30, 1981

HP Smith Paper Co.

Mr. Jim Eldert
Alburn, Inc.
111 W. Washington St.
Chicago, IL 60602

Dear Mr. Eldert:

Gabriel has analyzed a waste stream brought to us by Mr. Dale DeValk owner of D & J Waste Refuse Disposal, 160 East 168th Street, South Holland, IL 60473. The waste is an alcohol which has a BTU of 19,660. The entire lab analysis is attached.

Mr. DeValk would like to have this material permitted to Alburn. He will give you all the details regarding the generator's EPA number, etc. at his office, 331-5171.

Please call me if there are any questions regarding the analysis.

Sincerely yours,

Mike Gower

Mike Gower
Technical Services Representative

Gabriel and Associates

MG/js

enc.

002587

gabriel and associates

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

April 30, 1981

Mr. Dale DeValk
D & J Waste Refuse Disposal
160 East 168th Street
South Holland, IL 60473

Laboratory No: 2055-81

Dear Mr. DeValk:

Listed below are the analyses of material submitted to Gabriel for analytical testing according to Auburn requirements.

<u>Analysis</u>	<u>Result</u>
Gross BTU/lb.	19,660
Total Sulfur	< 50 ppm
Organic Chlorine	< 35 ppm
Water by Distillation	90 % *
Ash	7600 (0.76%)
PCB (ppm)	< 2 ppm
Mercury (ppb)	2.0
Lead (ppm)	4.0 ppm
Flash Point	< 40°F
Karl Fischer Moisture	0.3%

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Correct moisture is given by the Karl Fischer Method.

If there are any questions, please call at once.

Sincerely,

Mike Gower

Mike Gower
Technical Services Representative

Gabriel and Associates

MG/js

602586

CARD TYPE DATE 5/14/81 L P S W C AUTHORIZATION NUMBER TRANS CODE DATE ENTERED (Agency Use)

WASTE CHARACTERISTICS

METAL KEY	TOTAL	(PPM)	LEACH	(PPM)	METAL KEY	TOTAL	(PPM)	LEACH	(PPM)
CH	0 1				Cu	0 2			
Ag	0 3				Hg	0 4			
As	0 5				Ni	0 6			
Ba	0 7				Pb	0 8			
Cd	0 9				Se	1 0			
Cr	1 1				Zn	1 2			

LABORATORY NAME CERTIFICATION NUMBER REVIEWED BY:

1 SITE CODE 0 3 1 6 0 0 3 1 SITE NAME ALBURN, INC. USEPA ID # ILD 000716852

DISPOSAL METHOD 1 6 NEUTRALIZATION METHOD STATUS START DATE EXPIRATION DATE SIGNATURE ALBURN, INC. SIGNATURE ALBURN, INC.

2 SITE CODE SITE NAME DISPOSAL METHOD NEUTRALIZATION METHOD STATUS START DATE EXPIRATION DATE SIGNATURE SIGNATURE

3 SITE CODE SITE NAME DISPOSAL METHOD NEUTRALIZATION METHOD STATUS START DATE EXPIRATION DATE SIGNATURE SIGNATURE

4 SITE CODE SITE NAME DISPOSAL METHOD NEUTRALIZATION METHOD STATUS START DATE EXPIRATION DATE SIGNATURE SIGNATURE

5 SITE CODE SITE NAME DISPOSAL METHOD NEUTRALIZATION METHOD STATUS START DATE EXPIRATION DATE SIGNATURE SIGNATURE

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND/NOISE POLLUTION CONTROL
SPECIAL WASTE DISPOSAL APPLICATION

CARD TYPE DATE 5/14/81 L P S W C AUTHORIZATION NUMBER 790650 TRANS CODE 15 DATE ENTERED (Agency Use) 15 / 15 / 19 80

HAULER REGISTRATION NUMBER 0868 NAME D. & J WASTE REFUSE DISPOSAL
ADDRESS 160 East 168th St. COMMUNITY South Holland
COUNTY Cook STATE IL ZIP 60473 AREA CODE 312 TELEPHONE 3315171

WASTE GENERATOR USEPA ID Number ILD 074411745
GENERATOR CODE * NAME H. P. SMITH PAPER CO.
ADDRESS 5001 West 66th Street COMMUNITY Bedford Park
COUNTY Cook STATE IL ZIP 60638 AREA CODE 312 TELEPHONE 4580777
GENERATOR CONTACT NAME J O H N S U L L I V A N
DUNS NUMBER 26 SIC CODE 2641

PROCESS NAME L A M I N A T I N G

WASTE CHARACTERISTICS
GENERIC WASTE NAME W A S T E S O L V E N T S

IUPAC WASTE NAME 21
TOTAL ANNUAL WASTE VOLUME 100000 VOLUME UNITS 2 WASTE PHASE 3
TRANSPORT FREQUENCY 5 WASTE CLASS (Agency Use) 64 85
1 = ONE TIME 5 = MONTHLY 1 = CUBIC YARDS 1 = SOLID
2 = DAILY 6 = BI-MONTHLY 2 = GALLONS 2 = SEMI-SOLID
3 = WEEKLY 7 = QUARTERLY 3 = LIQUID
4 = BI-WEEKLY 8 = SEMI-ANNUALLY 4 = GAS

(Code either "1" for Low, "2" for Medium, or "3" for High as appropriate for columns 21 through 26):
INHALATION TOXICITY 21 DERMAL TOXICITY 22 INGESTIVE TOXICITY 23 INFECTIOUS 24 REACTIVITY 25 EXPLOSIVE 26
FLASH POINT 27 OF ALPHA RADIATION 31 (pCi/L) COMPOSITION 37
1 = ORGANIC
2 = INORGANIC

PERCENT ACIDITY 38 PERCENT ALKALINITY 41 PH 43 PERCENT TOTAL SOLIDS 47 PERCENT ASH CONTENT 52
KEY COMPONENT NAME PERCENT KEY COMPONENT NAME PERCENT
1 21 22 43 44 47 48 49 70 71 74
3 21 22 43 44 47 48 49 70 71 74
5 21 22 43 44 47 48 49 70 71 74

* Applied for herein

Refer to attached analyses.

002584

ALBURN, Inc.

GENERAL OFFICE
111 W. WASHINGTON STREET
CHICAGO, ILLINOIS 60602

JULIA M. HAGERTY
PRESIDENT

EUGENE DOONER MURPHY
EXECUTIVE VICE-PRESIDENT

(312) 236-2951

May 14, 1981

Mr. Rama K. Chaturvedi, P.E.
Manager, Special Waste Unit
Residual Management Section
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Special Waste Disposal Application
H. P. Smith Paper Co.
Bedford Park, IL

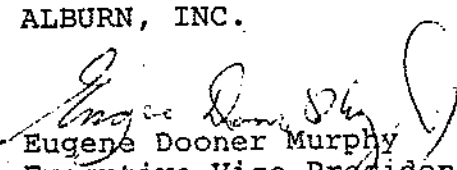
Dear Mr. Chaturvedi:

Enclosed find five copies, with attachments, of application for the above referenced generator. Please assign a Generator Code to this generator.

Please note that the result of the analysis for water content, shown on the attached Lab report from Gabriel and Associates, is an error. As soon as we receive the corrected analysis, we will forward same to you. The correct moisture should be 0.3%.

Yours very truly,

ALBURN, INC.


Eugene Dooner Murphy
Executive Vice President

EDM:jm
Encs.

cc: James Cobb
James H. Eldert
Richard J. Trzupek

002583

2/19/93 mem.

Both lists

Dr

002582

H. P. Smith.

AUBURN CODING FORMS

GENERATOR: (125) H. P. SMITH PAPER CO, Chi.TRANSPORTER: (74) D + J Waste RefuseWASTE PROFILE: (Yes) NoDATE SENT: 03 - 30 - 82 REC.: 03 - 30 - 82WASTE QUAN: 1700 Gallons (1) Cu Yds (2) LBS (3)DELV METH 1: ___ Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

DELV METH 2: ___ Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

WASTE FORM: Liquid (L) Solid (S) Mixture (M) Gas (G) Sludge (D)WASTE NAME: (415) Solvent NOSHAZARD CLASS: (345) (FL)

UN, NA: _____

EPA #: 0001DOC TYPE 1: M (L) _____

DOC TYPE 3: M L _____

DOC NUM 1: 1396

DOC NUM 3: _____

TECHLAW N1: 640

TECHLAW N3: _____

DOC TYPE 2: (M) L _____

DOC TYPE 4: M L _____

DOC NUM 2: EL 0273114

DOC NUM 4: _____

TECHLAW N2: 641

TECHLAW N4: _____

COMMENTS: _____

AUBURN CODING FORMS

GENERATOR:

125, H. P. SMITH PAPER CO.

TRANSPORTER:

74, D + J Waste RefuseWASTE PROFILE: ☒ Yes ☐ No

DATE SENT:

05-25-82

REC.:

05-25-82

WASTE QUAN:

1760Gallons ☒ Cu Yds (2) LBS (3)

DELV METH 1:

___ Drums ☒ Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

DELV METH 2:

___ Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

WASTE FORM:

Liquid ☒ Solid (S) Mixture (M) Gas (G) Sludge (D)

WASTE NAME:

415, Solvent NOS

HAZARD CLASS:

345, (FL)

UH, NA:

EPA I:

DO01

DOC TYPE 1:

M ☒

DOC TYPE 3:

M L

DOC NUM 1:

1504

DOC NUM 3:

TECHLAW N1:

642

TECHLAW N3:

DOC TYPE 2:

☒ L

DOC TYPE 4:

M L

DOC NUM 2:

IL 0273117

DOC NUM 4:

TECHLAW N2:

643

TECHLAW N4:

COMMENTS:

AUBURN CODING FORMS

GENERATOR:

(125) H. P. SMITH PAPER CO.

TRANSPORTER:

(74) D + J Waste Refuse

WASTE PROFILE:

☒ Yes ☐ No

DATE SENT:

06-23-82

REC.: 06-23-82

WASTE QUAN:

1760

Gallons ☒ Cu Yds (2) LBS (3)

DELV METH 1:

32 Drums ☒ Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

DELV METH 2:

Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

WASTE FORM:

Liquid ☒ Solid (S) Mixture (M) Gas (G) Sludge (D)

WASTE NAME:

(415) solvent NOS (42% CI)

HAZARD CLASS:

(345) (FL)

UH, NA:

EPA 1:

1001

DOC TYPE 1:

M ☒ L

DOC TYPE 3:

M L

DOC NUM 1:

1569

DOC NUM 3:

TECHLAW N1:

644

TECHLAW N3:

DOC TYPE 2:

☒ L

DOC TYPE 4:

M L

DOC NUM 2:

IL 0273120

DOC NUM 4:

TECHLAW N2:

645

TECHLAW N4:

COMMENTS:

AUBURN CODING FORMS

GENERATOR: (125) H. P. SMITH PAPER CO.TRANSPORTER: (74) D & J Waste RefuseWASTE PROFILE: ☒ Yes ☐ NoDATE SENT: 04-28-82 REC.: 04-28-82WASTE QUAN: 1700 Gallons ☒ (1) Cu Yds (2) LBS (3)DELV METH 1: 31 Drums ☒ (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)DELV METH 2: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)WASTE FORM: Liquid ☒ (L) Solid (S) Mixture (M) Gas (G) Sludge (D)WASTE NAME: (489) Waste OilHAZARD CLASS: (345) (FL)UH, NA: EPA 1: 0001DOC TYPE 1: M ☒ (L) DOC TYPE 3: M L DOC NUM 1: 1438DOC NUM 3: TECHLAW N1: 646TECHLAW N3: DOC TYPE 2: ☒ (M) L DOC TYPE 4: M L DOC NUM 2: IL 0273116DOC NUM 4: TECHLAW N2: 647TECHLAW N4: COMMENTS:

AUBURN CODING FORMS

GENERATOR: 125 H. P. SMITH PAPER CO.TRANSPORTER: 74 D + J Waste RefuseWASTE PROFILE: Yes NoDATE SENT: 02-09-82 REC.: 02-00-82WASTE QUAN: 1760 Gallons (1) Cu Yds (2) LBS (3)DELV METH 1: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)DELV METH 2: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)WASTE FORM: Liquid (L) Solid (S) Mixture (M) Gas (G) Sludge (D)WASTE NAME: 415 solvent NOSHAZARD CLASS: 345 (FL)

UH, NA: _____

EPA 1: 8001DOC TYPE 1: (M) L _____

DOC TYPE 3: M L _____

DOC NUM 1: IL 0273112

DOC NUM 3: _____

TECHLAW N1: 649

TECHLAW N3: _____

DOC TYPE 2: M L _____

DOC TYPE 4: M L _____

DOC NUM 2: _____

DOC NUM 4: _____

TECHLAW N2: _____

TECHLAW N4: _____

COMMENTS: IL manifest #, illegible

AUBURN CODING FORMS

GENERATOR: 125, H. P. SMITH PAPER CO.TRANSPORTER: 74, D + J Waste RefuseWASTE PROFILE: ☒ Yes ☐ NoDATE SENT: 05-27-81 REC.: 05-27-81WASTE QUAN: 1760 Gallons ☒ Cu Yds (2) LBS (3)DELV METH 1: Drums Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)DELV METH 2: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)WASTE FORM: Liquid ☒ Solid (S) Mixture (M) Gas (G) Sludge (D)WASTE NAME: 415, Solvent NOSHAZARD CLASS: 345, (FL)UN, NA: _____ EPA #: 8001DOC TYPE 1: ☒ M ☐ L _____DOC TYPE 3: ☐ M ☐ L _____DOC NUM 1: IL 0120687

DOC NUM 3: _____

TECHLAW N1: 650

TECHLAW N3: _____

DOC TYPE 2: ☐ M ☐ L _____DOC TYPE 4: ☐ M ☐ L _____

DOC NUM 2: _____

DOC NUM 4: _____

TECHLAW N2: _____

TECHLAW N4: _____

COMMENTS: _____

AUBURN CODING FORMS

GENERATOR:

(125) H. P. SMITH PAPER CO.

TRANSPORTER:

(74) D + J Waste Refuse

WASTE PROFILE: ☒ Yes ☐ No

DATE SENT:

16-25-81

REC.: 16-25-81

WASTE QUAN:

1760 Gallons (1) Cu Yds (2) LBS (3)

DELV METH 1: _____ Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

DELV METH 2: _____ Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

WASTE FORM: Liquid (L) Solid (S) Mixture (M) Gas (G) Sludge (D)

WASTE NAME:

(415) solvent NOS

HAZARD CLASS:

(345) (FL)

UN, RA:

EPA 1:

DOC TYPE 1: ☒ M ☐ L _____DOC TYPE 3: ☐ M ☐ L _____

DOC NUM 1:

IL 0120688

DOC NUM 3:

TECHLAW N1:

651

TECHLAW N3:

DOC TYPE 2: ☐ M ☐ L _____DOC TYPE 4: ☐ M ☐ L _____

DOC NUM 2:

DOC NUM 4:

TECHLAW N2:

TECHLAW N4:

COMMENTS:

AUBURN CODING FORMS

GENERATOR:

(125) H. P. SMITH PAPER CO.

TRANSPORTER:

(74) D + J Waste Refuse

WASTE PROFILE: ☒ Yes ☐ No

DATE SENT:

07-29-81

REC.:

07-29-81

WASTE QUAN:

1760

Gallons

(1)

Cu Yds (2)

LBS (3)

DELV METH 1:

Drums

(4)

Barrels (5)

Tank Truck (6)

Open Truck (7)

CT (8)

DR (9)

DELV METH 2:

Drums (4)

Barrels (5)

Tank Truck (6)

Open Truck (7)

CT (8)

DR (9)

WASTE FORM:

Liquid

(L)

Solid (S)

Mixture (M)

Gas (G)

Sludge (D)

WASTE NAME:

(415)

solvent

NOS

HAZARD CLASS:

(345)

(FL)

UN, NA:

EPA 1:

D001

DOC TYPE 1:

(M)

L

DOC TYPE 3:

M

L

DOC NUM 1:

IL 0120689

DOC NUM 3:

TECHLAW N1:

652

TECHLAW N3:

DOC TYPE 2:

M

L

DOC TYPE 4:

M

L

DOC NUM 2:

DOC NUM 4:

TECHLAW N2:

TECHLAW N4:

COMMENTS:

AUBURN CODING FORMS

GENERATOR:

(125) H. P. SMITH PAPER CO.

TRANSPORTER:

(74) D + J Waste Refuse

WASTE PROFILE: ☒ Yes ☐ No

DATE SENT:

08-27-81

REC.: 08-27-81

WASTE QUAN:

1760 Gallons (1) Cu Yds (2) LBS (3)

DELV METH 1: ☐ Drums ☐ Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)DELV METH 2: ☐ Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)WASTE FORM: Liquid (L) ☒ Solid (S) Mixture (M) Gas (G) Sludge (D)

WASTE NAME:

(415) solvent NOS

HAZARD CLASS:

(345) (FL)

UN, NA:

EPA :

0001

DOC TYPE 1:

(M)

L

DOC TYPE 3:

M

L

DOC NUM 1:

IL 0120690

DOC NUM 3:

TECHLAW N1:

653

TECHLAW N3:

DOC TYPE 2:

M

L

DOC TYPE 4:

M

L

DOC NUM 2:

DOC NUM 4:

TECHLAW N2:

TECHLAW N4:

COMMENTS:

AUBURN CODING FORMS

GENERATOR: (125) H. P. SMITH PAPER CO.TRANSPORTER: (74) D & J Waste RefuseWASTE PROFILE: Yes NoDATE SENT: 09-23-81 REC.: 09-23-81WASTE QUAN: 1760 Gallons (1) Cu Yds (2) LBS (3)DELV METH 1: ___ Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

DELV METH 2: ___ Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

WASTE FORM: Liquid (L) Solid (S) Mixture (M) Gas (G) Sludge (D)WASTE NAME: (415) SOLVENT NOSHAZARD CLASS: (345) (FL)

UH, NA: _____

EPA #: 0001DOC TYPE 1: (M) L _____

DOC TYPE 3: M L _____

DOC NUM 1: IL 0273107

DOC NUM 3: _____

TECHLAW N1: 654

TECHLAW N3: _____

DOC TYPE 2: M L _____

DOC TYPE 4: M L _____

DOC NUM 2: _____

DOC NUM 4: _____

TECHLAW N2: _____

TECHLAW N4: _____

COMMENTS: _____

AUBURN CODING FORMS

GENERATOR: (125) H. P. SMITH PAPER CO.TRANSPORTER: (74) D + J Waste RefuseWASTE PROFILE: (Yes) NoDATE SENT: 10 - 20 - 82 REC.: 10 - 20 - 82WASTE QUAN: 1760 Gallons (1) Cu Yds (2) LBS (3)DELV METH 1: 32 Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)DELV METH 2: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)WASTE FORM: Liquid (L) Solid (S) Mixture (M) Gas (G) Sludge (D)WASTE NAME: (415) solvent NOS(0.2% CI, 1.0% ASH, 17467 BTU¹⁵/LB)HAZARD CLASS: (345) (FL)UN, (NA) 1993EPA 1: 2001DOC TYPE 1: M (L)

DOC TYPE 3: M L

DOC NUM 1: 1723DOC NUM 3: TECHLAW N1: 655TECHLAW N3: DOC TYPE 2: (H) L

DOC TYPE 4: M L

DOC NUM 2: IL 0661756DOC NUM 4: TECHLAW N2: 656TECHLAW N4: COMMENTS:

AUBURN CODING FORMS

GENERATOR: (125) H. P. SMITH PAPER CO.TRANSPORTER: (74) D + J Waste RefuseWASTE PROFILE: ☒ Yes ☐ NoDATE SENT: 10-21-81 REC.: 10-21-81WASTE QUAN: 1760 Gallons ☒ Cu Yds (2) LBS (3)DELV METH 1: Drums ☒ Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)DELV METH 2: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)WASTE FORM: Liquid ☒ Solid (S) Mixture (M) Gas (G) Sludge (D)WASTE NAME: (415) Solvent NOSHAZARD CLASS: (345) (FL)UN, NA: EPA I: 0001DOC TYPE 1: ☒ M ☐ L DOC TYPE 3: ☐ M ☐ L DOC NUM 1: IL 0273108 DOC NUM 3: TECHLAW N1: 657 TECHLAW N3: DOC TYPE 2: ☐ M ☐ L DOC TYPE 4: ☐ M ☐ L DOC NUM 2: DOC NUM 4: TECHLAW N2: TECHLAW N4: COMMENTS:

AUBURN CODING FORMS

GENERATOR: (125) H. P. SMITH PAPER CO.

TRANSPORTER: (74) D + J Waste Refuse

WASTE PROFILE: Yes No

DATE SENT: 11 - 12 - 81 REC.: 11 - 12 - 81

WASTE QUAN: 1760 Gallons (1) Cu Yds (2) LBS (3)

DELV METH 1: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

DELV METH 2: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

WASTE FORM: Liquid (L) Solid (S) Mixture (M) Gas (G) Sludge (D)

WASTE NAME: (415) Solvent NOS

HAZARD CLASS: (345) (FL)

UH, NA: _____

EPA 1: 2001

DOC TYPE 1: (M) L _____

DOC TYPE 3: M L _____

DOC NUM 1: IL 0273109

DOC NUM 3: _____

TECHLAW N1: 658

TECHLAW N3: _____

DOC TYPE 2: M L _____

DOC TYPE 4: M L _____

DOC NUM 2: _____

DOC NUM 4: _____

TECHLAW N2: _____

TECHLAW N4: _____

COMMENTS: _____

AUBURN CODING FORMS

GENERATOR:

(125) H. P. SMITH PAPER CO.

TRANSPORTER:

(74) D & J Waste Refuse

WASTE PROFILE: Yes No

DATE SENT:

11 - 12 - 82

REC.: 11 - 12 - 82

WASTE QUAN:

1760

Gallons (1) Cu Yds (2) LBS (3)

DELV METH 1: 32 Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

DELV METH 2: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

WASTE FORM: Liquid (L) Solid (S) Mixture (M) Gas (G) Sludge (D)

WASTE NAME:

(415) SOLVENT NOS

(8% CL, 72% ASH, 16891 BTU'S/LB)

HAZARD CLASS:

(345)

(FL)

UN. (NA)

1993

EPA 1:

D001

DOC TYPE 1:

M

(L)

DOC TYPE 3: M L

DOC NUM 1:

1738

DOC NUM 3:

TECHLAW N1:

659

TECHLAW N3:

DOC TYPE 2:

(M)

L

DOC TYPE 4: M L

DOC NUM 2:

IL 066 1758

DOC NUM 4:

TECHLAW N2:

660

TECHLAW N4:

COMMENTS:

AUBURN CODING FORMS

GENERATOR: (125) H. P. SMITH PAPER CO.

TRANSPORTER: (74) (D + J)

WASTE PROFILE: (Yes) No

DATE SENT: 12-22-81 REC.: 12-23-81

WASTE QUAN: 1760 Gallons (1) Cu Yds (2) LBS (3)

DELV METH 1: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

DELV METH 2: Drums (4) Barrels (5) Tank Truck (6) Open Truck (7) CT (8) DR (9)

WASTE FORM: Liquid (L) Solid (S) Mixture (M) Gas (G) Sludge (D)

WASTE NAME: (415) solvent NOS

HAZARD CLASS: (345) (FL)

NA: 1993 EPA: 0001

DOC TYPE 1: (M) L

DOC TYPE 3: M L

DOC NUM 1: EL 0273110

DOC NUM 3:

TECHLAW N1: 661

TECHLAW N3:

DOC TYPE 2: M L

DOC TYPE 4: M L

DOC NUM 2:

DOC NUM 4:

TECHLAW N2:

TECHLAW N4:

COMMENTS:

HAZARDOUS WASTE WORK SHEET

GENERATOR GEORGIA PACIFIC CORP.
ADDRESS Second Place + Waite St., P O Box 4322
GARY, IN 46404
TELEPHONE 219 / 882-1640
PERSON(S) CONTACTED Ken Renshaw

Waste Description (process, treatment, dewatering device, chemical characteristics, physical characteristics, i.e., percent solids)

3-11-87 AM. Spoke with Ken Renshaw at Georgia Pacific. He said as far as he knows, their clarifier sludge is still being surface applied to low areas on the Gary airport. Hauler is Dan McArdle (398-1309). He will investigate the complaint to assure that waste is still being properly disposed of.

Waste is from production of paper towels. Squee press dewatered sludge from clarifier to 50% solids. This disposal has been ongoing for about 1 year.

Ken will call back after he investigates further.

3-13-87 Ken called. Said his investigation showed that waste is being disposed of as required at the Gary airport.

NO 3/13

April 16, 1975

Same letter to addresses below,

Dear *****

Re: Landfilling of sludge

You are hereby authroized to accept for landfill approximately 120,000 cubic yards of sludge from the Gerogia-Pacific Co, GaryInd. sludge drying beds. This sludge is to be hauled from the Ga-Pacific sludge beds by the Independent Sanitation Co of Merrillville, Ind

This authority is for a one time landfill application only and only by the Independent Sanitation Co. Acceptance of this innocous material is made on the condition that application will be on clay ground at your disposal site and will be covered, after completion of the disposal operation, by a minimum of one foot of clay earth. Also, please note, that this approval is for landfilling at your site for the Independent Sanitation Co only.

If you have any further questions, please call this office and we will be glad to assist you.

VTY

Same letter to

Mr. Vince X Zarlonga, Supt
Bongi Construction Co
PO Bos 6344
Gary Indiana

and Mr. Walter Samocki, pres
Samocki Construction Co
5030 Industrial Highway
Gary, Indiana

with carbon copy to
Mr. T. Crumpton, VP
Indenpendent Waste Systems, inc
PO Box 8206
Merrillville, Indiana

JDI

April 16, 1975

To: P. L. Stevens and Brian Opel
From: R; Cleaton

Re: Gerogia-Pacific Sludge drying bed waste

After repeated attempts to get the subject Company to remove the dried sludge from their sludge beds I find that I have been successful. the Company has contacted several disposal firms for removal and landfilling of this innocuous sludge so that the Company can continue to use this dewatering bed process without overflowing into the adjacent Grand Calumet River.

Accordingly Independent Waste Systems of ~~XXX~~ Merrillville, one of the hopeful bidders has asked that I make an inspection of two sites and write a letter of recommendation as to the acceptance of these sites for the landfilling of this sludge.

Today I did make such an inspection and find that both the Bongi Construction Co and Samokci Construction Co have acceptable sites for the disposal of this sludge. Both sites have deep pits where sand has been mined. The bottom of the pits are on blue clay and, I am told, that this clay is approx 25 to 40 foot in depth. In talking with the supervisors of each proposed land fill site, I pointed out to them the various conditions of acceptance of their site as the application of this sludge. These conditions included a minimum daily cover and a final cover as stated in the accompanying letter. The sites as visually inspection appear to be ideally suited for this type of landfill. The water table is practically nonexistent and a firm clay base is present. Cover material could be obtained from on-site clay. I also made apparent to each Company that this was not a license to begin industrial landfilling but was only a one time operation and for this material only. I tried to communicate to each Company that acceptance of other materials could cause litigation and pollution because of interaction of different materials.

On this basis, I am recommending eith of the Companies for landfill of this sludge only.

what about clay for lining sides of pits?

Special Projects Certification Worksheet

Generator Georgia-Pacific
Address _____
Gary
Waste paper sludge
Disposal Site —

Date 5/10
Certification No. 00451
Evaluator HPe

Comments: (Provide the necessary information to document your review of the waste. Record all contacts and resources consulted).

Christa assigned on rush basis
G-P wants classify for on-site disposal

asked for new analysis, E-P for OK.
give SW permit for paper sludge

5/10 Jack Anderson - says no bleach process
at all - so no dioxins. Will get back
to him w/ info needed for classify

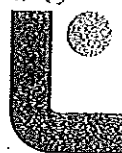
2000 Dombey Road
Portage, Indiana 46368
219/762-8588/9

JUL 2 9 04 AM '90

Leader Industries, Inc.

OFFICE OF SOLID
AND HAZARDOUS
WASTE MGMT
DEM

... Protecting Our Environment



June 29, 1990

Indiana Dept of Environment
Offices of Solid & Hazardous Waste Mgmt
105 South Meridian Street
Indianapolis, IN 46206

Dear Sir or Madam:

Please find enclosed a Special Waste Certification Application form along with analysis. The proposed site for disposal of soil is Wheeler Landfill.

My client is getting close to his 90 days and would like to move the material as soon as possible. Your prompt attention in this matter will be greatly appreciated.

Sincerely,

Mark Ball
Vice President/Operations

Enclosure

MB/rw

Special Waste Certification Application

Indiana Department of
Environmental Management
Office of Solid and Hazardous Waste Management
105 South Meridian Street
Indianapolis, Indiana 46206
Telephone 317/232-4473

For Office Use Only	
<input type="checkbox"/> New Application	Case No. _____
<input type="checkbox"/> Renewal	Date of Last Lab Analysis _____
<input type="checkbox"/> Amendment	Reviewer _____

Generator Information	
Generator Mailing Address	Generator Facility Location
Name <u>Georgia Pacific Corp.</u>	Name <u>Same</u>
Address <u>P.O. Box 4362</u>	Address <u>Same</u>
<u>2nd Place & White Street</u>	
<u>Lake, Greer, Ind, 46404</u>	
(County) (City) (State) (Zip)	(County) (City) (State) (Zip)
Technical Contact and Telephone # <u>KEN KENSHAW 317-882-1640</u>	Contact and Telephone # <u>Same</u>

Waste Information
Waste Name: <u># 6 Heating Oil</u>
Process name:
Brief description of the process: <u>oil that was spilled over a period of time</u>
Anticipated quantity and disposal frequency (cubic yards /year): <u>40 yds</u>
Type of waste containers (drums, bulk, rolloffs, etc.): <u>Rolloffs</u>
Proposed disposal site <u>Wheeler landfill</u>

Generator Signature		
I hereby certify that the information in this application is true and accurate to the best of my knowledge, and that this waste is not a hazardous waste as defined in 329 IAC 3.		
<u>KEN KENSHAW</u>	<u>K. J. Kenshaw</u>	<u>6/26/90</u>
Generator Name(type or print)	Signature	Date
Title		

Special Waste Certification Application (p2 of 4)

Contractor Information	
Applicant (if other than generator)	Proposed Disposal Site
Name	Name <u>Wheeler</u> Opp No.
Address	Address <u>St Rd 130 & Jones Rd</u>
	<u>Wheeler Ind 46303</u>
(County) / (City) / (State) / (Zip)	<u>Porter, Wheeler, Ind, 46303</u>
	(County) (City) (State) (Zip)
Technical Contact and Telephone #	Contact and Telephone #
	<u>John Murrell</u>

Sampling and Laboratory Information	
Laboratory	Sample Collector
Name <u>Tenco Laboratories</u>	Name <u>Bill Murrar</u>
Address <u>1150 Junction Ave.</u>	Address <u>2000 Donbey Rd</u>
<u>Shereville Ind 46375</u>	<u>Portage Ind 46368</u>
(County) <u>Lake</u>	(County) <u>Porter</u>
Technical Contact and Telephone #	Contact and Telephone #
<u>Grechen 219-322-2560</u>	<u>Bill Murrar 219-762-2167</u>

Renewal Information
Have there been any changes in the process, volumes or raw materials since the last certification? Yes___ No <u>X</u> If yes, attach a brief explanation.
Are you aware of any other facts or circumstances which have, or could have, altered the physical characteristics or chemical composition of the waste? Yes___ No <u>X</u> . If yes, provide a brief explanation.

Special Waste Certification Application (p3 of 4) SAMPLE No. _____
 (Attach a separate page for each analysis)

Analytical Data				
Waste Characteristics: (attach MSD Sheets if available)				
Physical state: <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Semi-solid <input type="checkbox"/> Liquid <input type="checkbox"/> Powder <input type="checkbox"/> Other				
Percent solids <u>100</u> %				
Fire, explosion, or spontaneous ignition hazard? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
Does this waste contain: Free liquids? <u>No</u> PCB's? <u>N</u> Asbestos? <u>N</u> Solvents? <u>N</u>				
Odor? None <input checked="" type="checkbox"/> Mild <input type="checkbox"/> Strong <input type="checkbox"/> Describe: _____				
Representative Sampling Information				
Date sample was collected: _____				
Was a sampling plan used? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If so, attach a copy.				
Is the sample representative of the waste? _____				
Sample type: <input type="checkbox"/> grab <input checked="" type="checkbox"/> composite				
Analysis: (attach laboratory sheets and support data)				
Laboratory that performed the analysis: <u>TENCO</u>				
Is the waste a listed hazardous waste as defined in 329 IAC 3? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
Ignitability (flash point) (D001) <u>>200</u> °F (<u> </u> °C)				
Corrosivity (pH)(D002) <u> </u>				
Reactivity (D003) Total(CN <u> </u> ppm S <u> </u> ppm) Reactive(CN <u> </u> ppm S <u> </u> ppm)				
Constituent*		Total (mg/kg)	EP TOX (mg/l)	TCLP (mg/l)
Arsenic	D004			
Barium	D005			
Cadmium	D006			
Chromium	D007			
Lead	D008			
Mercury	D009			
Selenium	D010			
Silver	D011			
Endrin**	D012			
Lindane**	D013			
Methoxychlor**	D014			
Toxaphene**	D015			
2,4 D**	D016			
2,4,5 TP (Silvex)**	D017			

3/89

*Provide either the EP Tox or TCLP results as appropriate.

Total values are acceptable if they are below the RCRA limits.

** If there is a reason to believe that these pesticides are present, then the analytical data is required.

Special Waste Certification Application (p4 of 4)

(for optional* data and restricted waste classification)

Sample No

(Attach a separate page for each analysis)

[illegible]

* It may not be necessary to complete this page, but provide all data available.

The neutral leachate test is required to determine the restricted waste type classification as defined in 329 IAC (2.101) and 329 IAC (2.102).

1150 Junction Avenue - Schererville, Indiana 46375

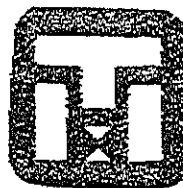
REPORT TO:

Bill Missal

CMC

2000 Dombey Rd

Portage, IN 46368



Date: 6/5/90

Recd: 5/23/90

~~DO~~ #: 22-1927

Allowable Range

Certified by: Catherine A. Wood

TENCO LABORATORIES

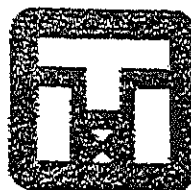
BPM INDUSTRIES

1150 Junction Avenue - Schererville, Indiana 46375

1-219-322-2560 • 1-800-428-3311

Page 1 of 2

REPORT TO:
Bill Missal
CMC
2000 Dombey Rd
Portage, IN 46368



Date: 6/5/90

Recd: 5/23/90

WO #: 22-1927

EPA METHOD

Laboratory Smp ID No.:	AA15963						
DESCRIPTION: —>	Oil, Gravel & Sand Georgia Pacific						Detection Limit
1. <i>ess otherwise noted; results in parts per million - ppm</i>	5/23/90						
PARAMETERS: ↓							
Acetone	ND						1 mg/kg
Benzene	ND						1 mg/kg
n-Butyl Alcohol	ND						1 mg/kg
Carbon Disulfide	ND						1 mg/kg
Carbon Tetrachloride	ND						1 mg/kg
Chlorobenzene	ND						1 mg/kg
Cresols	ND						1 mg/kg
Cy vlic Acid	ND						1 mg/kg
Cyclohexanone	ND						1 mg/kg
o-Dichloro Benzene	ND						1 mg/kg
Ethoxy Ethanol	ND						1 mg/kg
Ethyl Acetate	ND						1 mg/kg
Ethyl Benzene	ND						1 mg/kg
Ethyl Ether	ND						1 mg/kg
Isobutanol	ND						1 mg/kg
Methanol	ND						1 mg/kg
Methylene Chloride	ND						1 mg/kg

ND=Not Detected

TENCO LABORATORIES

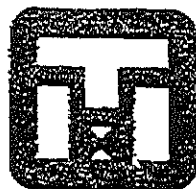
BPM INDUSTRIES

1150 Junction Avenue - Schererville, Indiana 46375

1-219-322-2560 • 1-800-428-3311

Page 2 of 2

REPORT TO:
Bill Missal
CMC
2000 Dombey Rd
Portage, IN 46368



Date: 6/5/90

Recd: 5/23/90

WO #: 22-1927

Laboratory Smp ID No.:	AA15963						
DESCRIPTION: —>	Oil, Gravel & Sand Georgia Pacific						Detection Limit
[L ess otherwise noted; results in parts per million - ppm]							
PARAMETERS: v	5/23/90						
Methyl Ethyl Ketone	ND						1 mg/kg
Methyl Isobutyl Ketone	ND						1 mg/kg
Nitrobenzene	ND						1 mg/kg
2-Nitro Propane	ND						1 mg/kg
Pyridine	ND						1 mg/kg
Tetrachloroethylene	ND						1 mg/kg
Toluene	ND						1 mg/kg
Trichloroethylene	ND						1 mg/kg
1,1,1-Trichloroethane	ND						1 mg/kg
1,1,2-Trichloroethane	ND						1 mg/kg
1,1,2-Trichloro-	ND						1 mg/kg
1,2,2-Trifluoroethane	ND						1 mg/kg
Trichlorofluoromethane	ND						1 mg/kg
Xylene	ND						1 mg/kg

ND=Not Detected

ANALYST: [Signature]

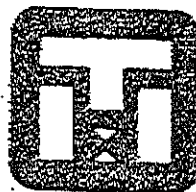
TENCO LABORATORIES

BPM INDUSTRIES

1150 Junction Avenue - Schererville, Indiana 46375

1-219-322-2560 • 1-800-428-3311

REPORT TO:
Bill Missal
CMC
2000 Dombey Rd
Portage, IN 46368



Date: 6/5/90

Recd: 5/23/90

WO #: 22-1927

KPA METHOD SW 846-8080

Laboratory Smp ID No.:

AA15963

DESCRIPTION: —>

If ss otherwise noted;
results in milligram/
kilogram - mg/kg

PARAMETERS: ↓

Oil, Gravel
& Sand
Georgia
Pacific

5/23/90

PCB's as:

AROCHLOR 1016

ND

AROCHLOR 1221

ND

AROCHLOR 1232

ND

AROCHLOR 1242

ND

AROCHLOR 1248

ND

AROCHLOR 1254

ND

AROCHLOR 1260

ND

ND=Not Detected at 1 mg/kg.

Certified by: *Anthony D. 12-11-90*



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

Solid Waste Disposal

Case No. 00451
Expires 5/30/91


The Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management, has reviewed the request for disposal of:


Paper sludge

generated by:

Georgia-Pacific Corporation
P.O. Box 4326
Gary, IN 46404

This waste is a solid waste and may be disposed of at any Indiana State Permitted Sanitary Landfill. It is recommended that you provide a copy of this disposal form to your Solid Waste Transporter and to the disposal site accepting the waste material. If you have any questions, please contact staff or myself at AC317-232-4473.

 6/6/90
Steven H. Poe Date
Environmental Scientist

 for G.O. 6/8/90
George Oliver, Chief Date
Special Projects Section
Office of Solid and Hazardous
Waste Management

An Equal Opportunity Employer



INDEPENDENT WASTE SYSTEMS Inc.

P. O. Box 269
Griffith, Ind. 46319
838-5121

P. O. Box 8206
Merrillville, Ind. 46410
769-3419 - 769-3410

P. O. Box 176
Lowell, Ind. 46356

Commercial — Industrial — Residential



LIQUID WASTE

May 13, 1975



Mr. Brian Opel
Indiana State Board of Health
Solid Waste Management Division
1330 West Michigan Street
Indianapolis, Indiana 46206

Dear Sir:

An analysis of the sludge which we propose to landfill
at Bongi Construction, Clark Road, Gary, Indiana or
Samocki Construction, Industrial Highway, Gary, Indiana,
is as follows:

85% Water *paper*
14% Solids
1% Bio-Degradable Materials
(No heavy metals have been noticed in the analysis)

We would appreciate your approval for this method and site
of disposal or any suggestions you may offer.

Thanks for your cooperation.

Very truly yours,

Thomas M. Crumpton
Vice President and General Mgr.

TMC:ifk

*** now going to Industrial Cinders Site*

HAZARDOUS WASTE WORK SHEET

GENERATOR SEALING CO. INC.

ADDRESS _____

TELEPHONE (219) 330-1040

PERSON(S) CONTACTED WHEELER

Waste Description (process, treatment, dewatering device, chemical characteristics, physical characteristics, i.e., percent solids)

8/5/82 CALLED MR. RINCHAW

✓ NAME
✓ PAPER MILL SLUDGE

✓ QTY. DISPOSED OF 25,000 CU YDS.

✓ TO LAST TIME DISPOSED OF OVER SEVEN YEARS AGO

✓ LANDFILL

✓ HOW HAULED - AFTER FRONT END LOADED

✓ ! -> SINCE NOT LIQUID MAY GO TO

WHEELER

✓ TOTAL AMOUNT PER DAY NOT TO EXCEED 100 CU YDS/DAY

✓ EXPIRATION DATE, OCT. 31, 82 -> MAY NEED EXTENSION
SBH64-040 4/79
State Form 36500
DUE TO VOLUME AND FILLING IS NOT CONTRACT
OUT.

✓ CHANGE LIQUID TO THE



intracompany memo

to Ken Renshaw
from Brian Warsham
subject Sludge Pond Permit

location Gary, IN
location Atlanta, GA
date June 10, 1982

I have reviewed our files and find no solid waste permit; however, since we only store wastes there and then periodically have the wastes removed to a landfill, the ponds should be considered storage and not disposal. Attached is a letter from the State which indicates that they are aware of our operations, but no permit was required at that time.

Also, as requested, I have included some information on completing an SPCC plan. One is a general guideline with sections that may not apply to your operation. Also, attached is a plan for G-P Grand Rapids, Michigan which is a good example.

If you have any questions or need any other information, please contact me.


B. C. W.

BCW/ds

cc: Fred McCaig

Attachment 13.5

Gary Municipal Airport Authority District



RICHARD GORDON HATCHER
MAYOR

AIRPORT BOARD OF AUTHORITY
ELIZABETH WILLIAMSON, President
GAIL PUGH HARRIS, Vice-President
VICTOR THORNTON, Secretary
JOHN BOWMAN, Commissioner

June 20, 1983

Special Projects Section
Land Pollution Control Division
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, IN 46206

JUL 6 10 51 AM '83
DIV. OF LAND POLLUTION CONTROL
STATE BOARD OF HEALTH

**RE: NEED FOR FILL MATERIAL TO BE USED
IN CONJUNCTION WITH A LANDSCAPING
PROJECT ON THE GARY AIRPORT**

Gentlemen:

We are requesting approval to move approximately 200,000 cubic yards of Georgia Pacific dehydrated paper pulp on to various depressions on the airport for landscaping purposes.

We have a need for a material that will readily grow grass.

Your immediate consideration of this request will be greatly appreciated.

Yours truly,

A handwritten signature in cursive script, reading "A. William Douglas".

A. William Douglas, Ph.D., P.E.

Executive Director

AWD:bjr

cc: file

A. WILLIAM DOUGLAS, Ph.D., P.E.

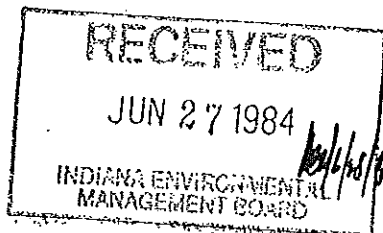
6131 INDUSTRIAL HIGHWAY GARY, INDIANA 46406 (219) 949-9722

2A

Gary Municipal Airport Authority District



RICHARD GORDON HATCHER
MAYOR



AIRPORT BOARD OF AUTHORITY
ELIZABETH WILLIAMSON, PRESIDENT
GAIL H. HARRIS, VICE-PRESIDENT
VICTOR THORNTON, SECRETARY
JOHN BOWMAN, COMMISSIONER

June 21, 1984

Mr. Ralph C. Pickard
Technical Secretary
Environmental Management Board
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

Re: Disposal of Dehydrated Paper Pulp
from Georgia Pacific
Gary, Indiana

On June 20, 1983, we requested approval to move approximately 200,000 cubic yards of Georgia Pacific Dehydrated Paper Pulp onto various depressions of the airport for landscaping purposes.

Though not mentioned in our letter, we were informed that Georgia Pacific had a need to dispose of the dehydrated paper pulp at a site other than the present site being utilized by them.

Recently we noted that their original site is still being extensively utilized by Georgia Pacific, and only a miniscule amount has been placed at Gary Airport.

We at Gary Airport would like to know if the Georgia Pacific site remains an approved site for disposal of the dehydrated paper pulp since this would affect the amount of dehydrated paper pulp that would be placed here at Gary Airport.

We have not been able to get any information from Georgia Pacific or Clark Material Handling, Inc., on the disposal of the dehydrated paper pulp.

If you have any questions concerning this request, please contact me at (219) 949-9722.

Sincerely yours,

A. William Douglas
A. William Douglas, Ph.D., P.E.

AED:llg

cc: Georgia Pacific

A. WILLIAM DOUGLAS, PH.D., P.E.
EXECUTIVE DIRECTOR

6131 INDUSTRIAL HIGHWAY GARY, INDIANA 46406 (219) 949-9722



Georgia-Pacific Corporation Second Place and Waite Street
P.O. Box 4326
Gary, Indiana 46404
Telephone (219) 882-1640

JULY 20, 1982

JUL 23 10 23 AM '82
DIV. OF LAND POLLUTION CONTROL
STATE BOARD OF HEALTH

MR. GEORGE OLIVER
INDIANA STATE BOARD OF HEALTH
DIVISION OF LAND POLLUTION CONTROL
1330 W. MICHIGAN ST.
INDIANAPOLIS, IN 46206

RE; OUR PHONE CONVERSATION ABOUT A WEEK AGO

DEAR GEORGE:

WE WOULD LIKE TO HAVE SOME OF THE SLUDGE REMOVED FROM TWO HOLDING BASINS.
WE WOULD LIKE TO KNOW WHAT LANDFILLS WE CAN HAUL IT TO.

THE AVERAGE SOLIDS IN ONE BASIN IS 24% AND IN THE OTHER 32%

THE CHEMICAL ANALYSIS OF THE TWO BASINS IS AS FOLLOWS:

<u>CONTAMINANT</u>	<u>1</u>	<u>2</u>
ARSENIC	< 0.06	< 0.08
BARIUM	0.3	< 1.0
CADIMUM	< 0.01	< 0.01
CHROMIUM	< 0.04	< 0.04
LEAD	0.2	0.1
MERCURY	< 0.001	< 0.001
SELENIUM	0	0.02
SILVER	0	0

WE ARE A PAPER MILL THAT MAKES INDUSTRIAL TOWELING. THE TYPE OF PAPER
TOWELS FOUND IN PUBLIC REST ROOMS. WE MAKE ABOUT 80 TONS PER DAY.
OUR FURNISH IS WASTE PAPER.

THE LIQUID INDUSTRIAL WASTE IS PROCESSED THROUGH A PRIMARY CLARIFIER.
THE SLUDGE FROM THE CLARIFIER IS PUMPED TO THE HOLDING BASINS, MENTIONED
ABOVE, TO THICKEN.

HOPE THIS IS THE INFORMATION YOU NEED. PLEASE CALL IF YOU HAVE ANY QUESTIONS.

THANK YOU VERY MUCH.

SINCERELY,

Kenneth J. Renshaw

KENNETH J. RENSHAW
TECHNICAL DIRECTOR

WALTER F. JONES, Jr.
ATTORNEY AT LAW

1111 East 54th Street, Dunnington Building
Indianapolis, Indiana 46221
(317) 257-4066 255-3869 634-6311

July 5, 1983

Hand delivered

Special Projects Section
Land Pollution Control Division
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, IN 46206

JUL 6 10 51 AM '83
DIV. OF LAND POLLUTION CONTROL
STATE BOARD OF HEALTH

RE: Application for Site Exclusion
Gary Municipal Airport
Authority District
6131 W. Industrial Hwy.
Gary, Indiana

Gentlemen:

I enclose herewith an original Application for Site Exclusion for the above referenced site located at 6131 Industrial Highway, Gary, Indiana.

Additional enclosures include:

1. Chemical analysis of Georgia Pacific dehydrated paper pulp by E.M.S., Inc.
2. Indiana Geological Survey Map, wherein the proposed site is identified.

If any additional information is required, please do not hesitate to contact the undersigned. Thank you for your consideration in this matter.

Sincerely,

Walter F. Jones, Jr.
Walter F. Jones, Jr.
Attorney at Law

WFJ:maa
Enclosure

CC: Charles Scott
Robert G. Grant

Application for Site Exclusion

This procedure has been established for high volume, low risk waste streams. The need for disposal of these wastes in approved areas other than sanitary landfills has been recognized. In most cases this type of material poses little or no threat to the environment or public health. It is the intent of this procedure to identify these residues and allow for their disposal in an organized and orderly manner.

This procedure will be implemented using a two-step process. The generator must first supply the Special Projects Section with a chemical analysis of the waste. The analysis will be waste specific for parameters requested. The landowner must then petition for an exclusion for the land disposal of each specific waste. Each application and petition will be considered on a case by case basis when it is received at the following address.

Special Projects Section
Land Pollution Control Division
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, IN 46206

JUL 6 10 51 AM '83
DIV. OF LAND POLLUTION CONTROL
STATE BOARD OF HEALTH

<u>Applicant (Name and Address)</u> Clark Material Handling, Inc. Clark Road PO.Box 74 Gary, Indiana 46312	<u>Property Owner (Name and Address)</u> Gary Municipal Airport Authority District 6131 W. Industrial Hwy. Gary, Indiana 46406
<u>Source of Waste (Generator)</u> Georgia Pacific Waite & 2nd Place Gary, Indiana 46402	<u>Description of Waste</u> Dehydrated paper Pulp
<u>General Information</u> Number of acres to be excluded <u>200 A.</u> Total acres of property <u>600 A.</u> Planned life of facility _____	<u>Expected Volume</u> Cubic Yards <u>200,000</u> or <u>one</u> time Tons _____ per Day Month Year (circle one)

Please include the following:

- A) The location of the proposed exclusion site.
- B) The legal description of the proposed exclusion site.
- C) USDA (United States Department of Agriculture) soils maps, and related soils limitation sheets or a USGS (United States Geological Service) Topographical map if soil maps are unavailable. Please outline the proposed area on the map which is provided.

Additional information may be requested after a staff review of the application.

Additional Requirements

A) If other waste material is to be disposed of a written request must be submitted and approved before any disposal takes place.

B) Should any nuisance or pollution condition be created from the disposal site (i.e. dust, odor, siltation of neighboring streams or ponds, rodent haborage, etc.) immediate corrective action shall be initiated by the owner or operator or both to rectify the situation.

C) Only specifically approved wastes may be disposed of on site. Any other nonapproved disposal will necessitate open dump enforcement action against the site. Restricted site access is required to control open dumping.

D) Upon completion of the site, the area must be graded to prevent ponding of water and planted with appropriate cover growth to prevent erosion of the cover soil. Some situations may require that up to two feet or more of final cover soil be applied to support plant growth.

E) If at any time the approved material(s) is found to pose a pollution or health hazard, then the exclusion will be void and the problem must be properly abated as specified by the Environmental Management Board or its designated agent.

F) It is the responsibility of the exclusion petitioner to provide for the disposal of this material in a manner that is not injurious to the public health or to the environment.

I hereby certify that to the best of my knowledge the application information and all attached details are accurate and complete. Furthermore, I guarantee that the facility will be operated as described in the above requirements.

Clark Material Handling, Inc

D. R. M. Walsh President
Operator's signature

June 27th, 1983

Date Gary Municipal Airport Authority District
A. W. Lough
Owner's signature Executive Director

June 21, 1983

Date

EMS Laboratories, Inc.

Two Environmental Plaza
7901 West Morris Street
Indianapolis, Indiana 46231 (317) 243-8304
EPA Certification # IN021

REPORT DATE February 23, 1983 DATE RECEIVED _____EMS SAMPLE # 31802P.O. # _____ SAMPLE TYPE GRAB COMPOSITE

SAMPLE SOURCES Hazlett & Associates
PO Box 519
East Chicago, Illinois 46312
Attn: Charlie Scott

WASTEWATER _____ DATE SAMPLED _____

SLUDGE _____ COLLECTED BY _____

BILL TO:

OIL _____ REMARKS _____

LEACHATE _____

RE: Georgia Pacific

OTHER _____ ND=Not detected at level indicated

PARAMETER	RESULTS	DATE ANALYZED	ANALYST	METHOD OF ANALYSIS
-----------	---------	---------------	---------	--------------------

pH	5.1	2-17	M. Branam	Electrode method
Total Solids	100,271 mg/l	2-18	J. Pagnanelli	Gravimetric

EP TOXICITY

Cadmium	ND @ .01 mg/l	2-21	C. Schneider	Atomic absorption
Chromium	ND @ .01 mg/l			
Lead	ND @ .1 mg/l			
Silver	ND @ .01 mg/l			
Barium	ND @ .1 mg/l			
Mercury	ND @ .0005 mg/l	2-21	C. Schneider	Flameless A A
Arsenic	ND @ .1 mg/l			
Selenium	ND @ .1 mg/l			

DATA REVIEWED BY: _____

REPORT COPY

Handwritten:
P-1
2-25-83
CK 2260

EMS Laboratories, Inc.

Two Environmental Plaza
7901 West Morris Street
Indianapolis, Indiana 46231 (317) 243-8304
EPA Certification # IN021

SAMPLE SOURCES Hazlett & Associates
PO Box 519
East Chicago, Illinois 46312
Attn: Charlie Scott

BILL TO:

REPORT DATE _____

EMS SAMPLE # 31778P.O. # _____ SAMPLE TYPE GRAB COMPOSITE

WASTEWATER _____

DATE SAMPLED _____

SLUDGE _____

COLLECTED BY _____

OIL _____

REMARKS _____

LEACHATE _____

OTHER _____

ND=Not detected at level indicated

PARAMETER	RESULTS	DATE ANALYZED	ANALYST	METHOD OF ANALYSIS
<u>#31778 - Lagoon Sludge</u>				
PCB	ND @ 2 ug/gr	2-17	M. Smith	Gas Chromatography

DATA REVIEWED BY: _____

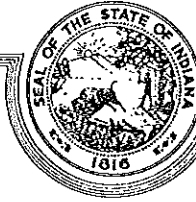
David A. Klingler

REPORT COPY

Rec'd
2-25-83
CL#260

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

AUG 11 1982.

Mr. Jerry Wise
Indiana Waste Systems, Inc.
P.O. Box 181
Wheeler, IN 46393

Dear Mr. Wise:

Re: Disposal of Paper Mill Sludge from
Georgia-Pacific Corporation, P.O. Box 4326
Gary, IN 46404

This letter acknowledges the request for disposal received July 23, 1982, from Georgia-Pacific Corporation.

Approval is hereby granted for disposal of 25,000 cubic yards, one time only, not to exceed 100 cubic yards per day, of paper mill sludge at the Wheeler Landfill, OPP. No. 64-3, Porter County. The waste is to be mixed with solid waste and covered with a minimum of six inches of cover soil by the end of the working day.

The approval is granted subject to the following conditions:

1. The generator and/or hauler must contact you to notify you of the time of disposal and conditions of shipment.
2. The waste will contain no free liquid.
3. This approval will expire October 31, 1982.

This approval will be revoked if the landfill fails to maintain compliance with 320 IAC 5-1, et seq. (Regulation SPC-18). Any necessary local approval must be obtained from the Porter County Health Department.

If you have any questions, please contact Ms. Janne Ketrow of the Solid Waste Management Branch at 317/633-8550.

Very truly yours,

Ralph C. Pickard
Technical Secretary

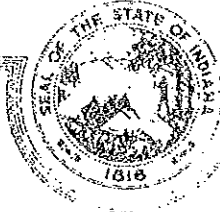
JRK

cc: Mr. Kenneth J. Renshaw, Georgia-Pacific Corporation
Porter County Health Department

file

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206 1964

1330 West Michigan Street
P.O. Box 1964

Mr. Dan McArdle
Clark Material Handling, Inc.
Clark Road
P.O. Box 74
Gary, IN 46312

August 18, 1983

Dear Mr. McArdle:

Re: Disposal of Dehydrated Paper Pulp
from Georgia Pacific
Gary, Indiana

Your paper pulp waste is hereby approved for disposal at the Gary Airport exclusion site with the following conditions:

1. If at any time the chemical composition of the waste changes (raw material or process change), the Division of Land Pollution Control must be notified. A new analysis may be required prior to disposal.
2. It is the responsibility of the generator to ensure that no other solid waste is mixed with the excluded waste. If such mixing occurs, the waste must be disposed of at a permitted sanitary landfill.

If you, as applicant, find that the terms and conditions of this approval are objectionable, you may petition for a hearing before the Environmental Management Board within fifteen (15) days after the date of receipt of this permit in accordance with IC 13-7-10-4(a).

If you have any questions about this approval or about your obligations pertaining to this matter, please call Mr. Stuart Miller or Mr. George Oliver of the Division of Land Pollution Control at 317/633-0742.

Very truly yours,

Ralph C. Pickard
Technical Secretary

SCM/dw

cc: Lake County Health Department
Mr. Walter F. Jones, Jr.
Dr. A. William Douglas
Georgia Pacific



Georgia-Pacific Corporation

2D1
Second Place and Waite Street
P.O. Box 4326
Gary, Indiana 46404
Telephone (219) 882-1640

AUG 8 10 10 AM '84
U.S. DEPT. OF HEALTH
ENVIRONMENTAL PROTECTION AGENCY

August 3, 1984

Mr. Louis Schoenburger
Division of Land Pollution Control
1330 West Michigan Street
P.O. Box 1964
Indianapolis, Indiana 46206

Dear Mr. Schoenburger:

As of August 1st we have been hauling our dehydrated paper pulp to the approved disposal site at the Gary Airport.

Enclosed is a copy of the flammability test you requested.

If you have any questions, please call me at (219) 882-1640.

Sincerely,

Kenneth J. Renshaw
Kenneth J. Renshaw
Technical Director

KJR/jr
Enclosure



NORTHERN LABORATORIES, INC.

ENVIRONMENTAL TESTING SERVICES
AIR & WATER POLLUTION-SOLID WASTES

SAMPLING - ANALYSIS - CONSULTING

Telephone (219) 464-2389

158 Napoleon
Valparaiso, Indiana 46383

LABORATORY REPORT

CLIENT	Georgia-Pacific Corporation	DATE	July 31, 1984
ATTENTION	Mr. Ken Renshaw	PHONE	882-1640
ADDRESS	2nd Pl. & Waite St. P.O. Box 4326, Gary, IN 46404		
DATE OF COLLECTION	July 23, 1984 (0859)		

PAPER MILL SLUDGE

PARAMETER

RESULTS

Flashpoint

>100° C

jmw

Approved By

Diane L. Harper
Manager of Operations

HAZARDOUS WASTE WORK SHEET

GENERATOR Georgia Pacific - Gary, I.N.
ADDRESS Second Place and White Street
Gary, I.N.
TELEPHONE (219) 882-1640
PERSON(S) CONTACTED Kenneth Renshaw - Tech. Director.

Waste Description (process, treatment, dewatering device, chemical characteristics, physical characteristics, i.e., percent solids)

200K yd³ Dehydrated Paper Pulp.

- ☒ Volume generated - 5-10 tons/day.
- ☒ Area of disposal (other than airport) - no. (other than ^{sludge} pits)
- ☒ flammability - check Chemists. ($> 100^{\circ}C$)
will find out if other Landfills are used
presently ^{held} in retention ponds. Being held
vol - 5-10 tons/day are generated.

8/3/84. Ken Renshaw called and told me the sludge comes from a belt filter press. I told him his old letter is still valid

* ☐ Check with Dan Strahl - Water Pol.
Land application

- ☒ Total Nitrogen.
- ☐ send C.C. to Chris Oppy - have him check out ~~app~~ process on site

PROPOSED DISPOSAL FACILITY At Gary Municipal ~~City~~ Airport

PROPOSED LIQUID WASTE HAULER Clark Material Handling, inc.

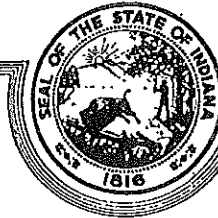
NAME _____

ADDRESS _____

TELEPHONE _____

PROPOSED DISPOSAL TECHNIQUE _____

STATE OF INDIANA



INDIANAPOLIS, 46206

ENVIRONMENTAL MANAGEMENT BOARD

1330 West Michigan Street
P. O. Box 1964

SEP 14 1982

Mr. Jerry Wise
Indiana Waste Systems, Inc.
P.O. Box 181
Wheeler, IN 46393

Dear Mr. Wise:

Re: Waste Disposal Approval Amendment
Increase Waste Volume and Time Extension
for Georgia-Pacific Corporation
P.O. Box 4326, Gary, IN 46404

Georgia-Pacific Corporation previously applied for approval to dispose of 25,000 cubic yards, one time only, not to exceed 100 cubic yards per day, of paper mill sludge at the Wheeler Landfill, OPP. No. 64-3, Porter County. This letter will amend the August 11, 1982, letter and increase the daily waste volume and extend the expiration date of the waste material. Effective immediately, approval is hereby granted for disposal, not to exceed 1000 cubic yards daily, of paper mill sludge. This approval will expire December 31, 1982. All other conditions of the previous approval of August 11, 1982, remain in effect.

If you have any question, please contact Ms. Janne Ketrow of the Solid Waste Management Branch at 317/633-8550.

Very truly yours,

Ralph C. Pickard
Technical Secretary

JRK

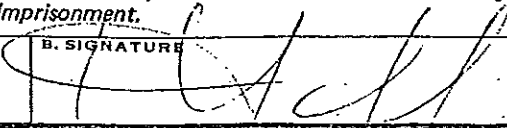
cc: Mr. Kenneth Renshaw, Georgia-Pacific Corporation
Porter County Health Department

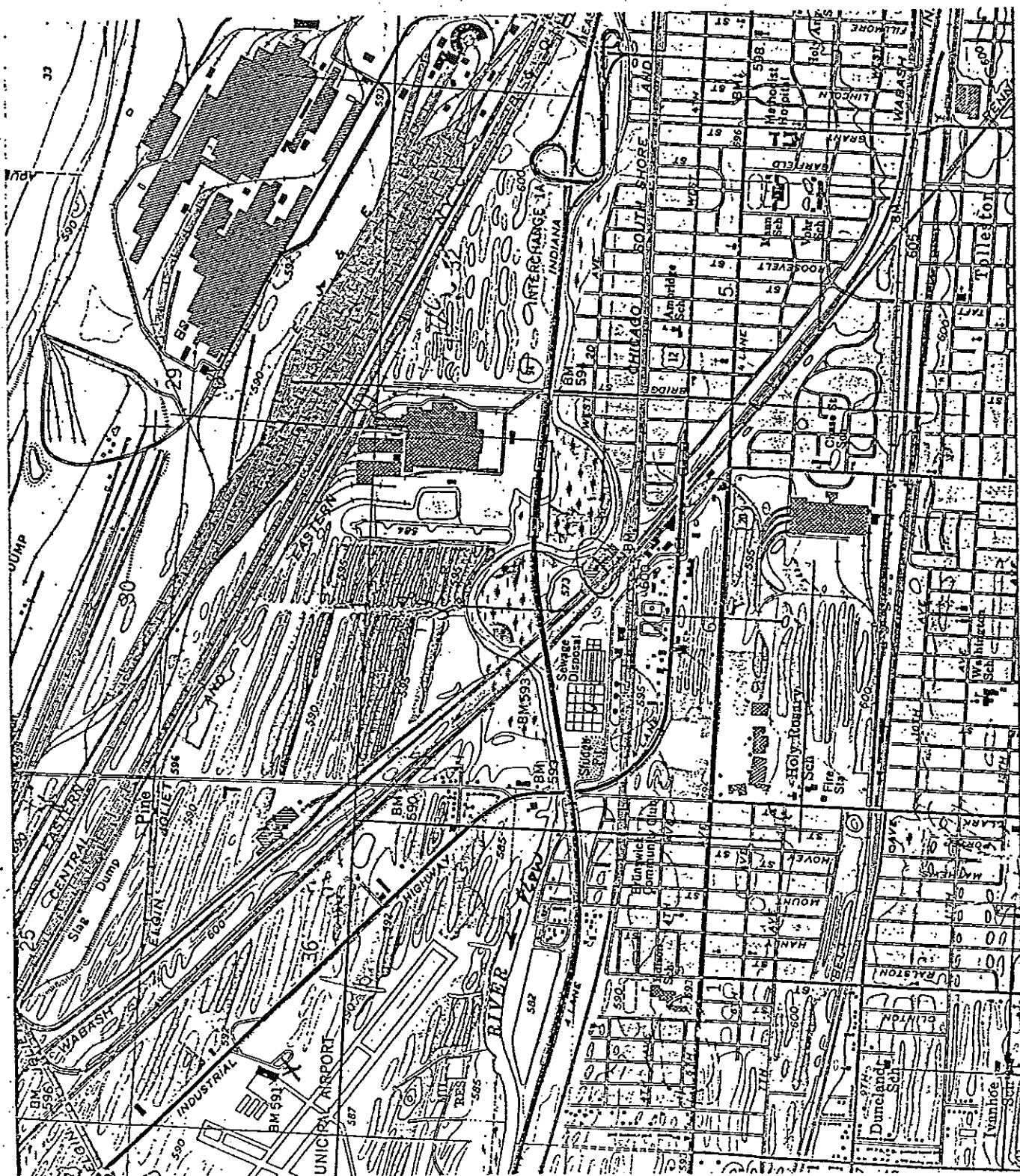
Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F I N D 0 0 3 9 3 8 8 0 0 D	
II. POLLUTANT CHARACTERISTICS		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items 1, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.			
III. FACILITY NAME		PLEASE PLACE LABEL IN THIS SPACE			
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.					
SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		YES	NO	FORM ATTACHED	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)			X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)
III. NAME OF FACILITY		C 1 SKIP GEORGIA-PACIFIC CORPORATION GARY PLANT			
IV. FACILITY CONTACT		A. NAME & TITLE (last, first, & title) B. PHONE (area code & no.)			
C 2 RENS HAW KENNETH TECHNICAL DIR.		2 1 9 8 8 2 1 6 4 0			
V. FACILITY MAILING ADDRESS		A. STREET OR P.O. BOX			
C 3 P O BOX 4326					
B. CITY OR TOWN		C. STATE		D. ZIP CODE	
C 4 GARY		IN		4 6 4 0 2	
VI. FACILITY LOCATION		A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
C 5 SECOND PLACE & WAITE STREET					
B. COUNTY NAME		C. CITY OR TOWN			
C 6 LAKE		D. STATE E. ZIP CODE F. COUNTY CODE (if known)			
		C 6 GARY IN 4 6 4 0 2			

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)									
A. FIRST					B. SECOND				
C	7	2	6	2	1	(specify) PAPER MILL			
C. THIRD					D. FOURTH				
C	7				(specify)				
C	7				(specify)				
VIII. OPERATOR INFORMATION									
A. NAME									
C	8 GEORGIA - PACIFIC CORPORATION								
B. Is the name listed in VIII-A also owner?									
XX YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)									
F = FEDERAL S = STATE P = PRIVATE					M = PUBLIC (other than federal or state) O = OTHER (specify) P				
D. PHONE (area code & no.)									
C	A	5 0 3		2 2 2		5 5 6 1			
E. STREET OR P.O. BOX									
9 0 0 S.W. FIFTH AVENUE									
F. CITY OR TOWN									
B P O R T L A N D									
G. STATE									
O R									
H. ZIP CODE									
9 7 2 0 4									
IX. INDIAN LAND									
Is the facility located on Indian lands?									
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									
X. EXISTING ENVIRONMENTAL PERMITS									
A. NPDES (Discharges to Surface Water)					D. PSD (Air Emissions from Proposed Sources)				
C	T	I			C	T	I		
9	N				9	P			
B. UIC (Underground Injection of Fluids)					E. OTHER (specify)				
C	T	I			C	T	I		
9	U				9				
C. RCRA (Hazardous Wastes)					E. OTHER (specify)				
C	T	I			C	T	I		
9	R				9				
XI. MAP									
<p>Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.</p>									
XII. NATURE OF BUSINESS (provide a brief description)									
MAKE INDUSTRIAL TOWELING									
XIII. CERTIFICATION (see instructions)									
<p>I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.</p>									
A. NAME & OFFICIAL TITLE (type or print)					B. SIGNATURE			C. DATE SIGNED	
R. A. SCHUMACHER SR. VICE PRESIDENT								11/18/80	
COMMENTS FOR OFFICIAL USE ONLY									
C									



Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	1. EPA I.D. NUMBER F
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FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)		2. NEW FACILITY (Complete item below.)	
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)		<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)	
YR. MO. DAY 4 8 15	FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)	YR. MO. DAY 72 74 75 76 77 78	FOR NEW FACILITY, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN
B. REVISED APPLICATION (place an "X" below and complete item I above)		2. FACILITY HAS A RCRA PERMIT.	
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS		<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT.	

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, the describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS.....	G	LITERS PER DAY.....	V	ACRE-FEET.....	A
LITERS.....	L	TONS PER HOUR.....	D	HECTARE-METER.....	F
CUBIC YARDS.....	Y	METRIC TONS PER HOUR.....	W	ACRES.....	B
CUBIC METERS.....	C	GALLONS PER HOUR.....	E	HECTARES.....	Q
GALLONS PER DAY.....	U	LITERS PER HOUR.....	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C										T/A C										1																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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Continued from the front.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W I N D 0 0 3 9 3 8 8 0 0													W DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES												
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))						
	23	24	25	26	27	28	29	30	31	32	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29									
1	F	0	0	3				200		G	S	0	1												
2	D	0	0	0				400		G	S	0	1												
3																									
4																									
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Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F I N D 0 0 3 9 3 8 8 0 0 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

8 7 3 1 3 0 W

LONGITUDE (degrees, minutes, & seconds)

4 1 3 6 3 0 N

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

F G

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

R. A. SCHUMACHER

11/18/80

X. OPERATOR CERTIFICATION

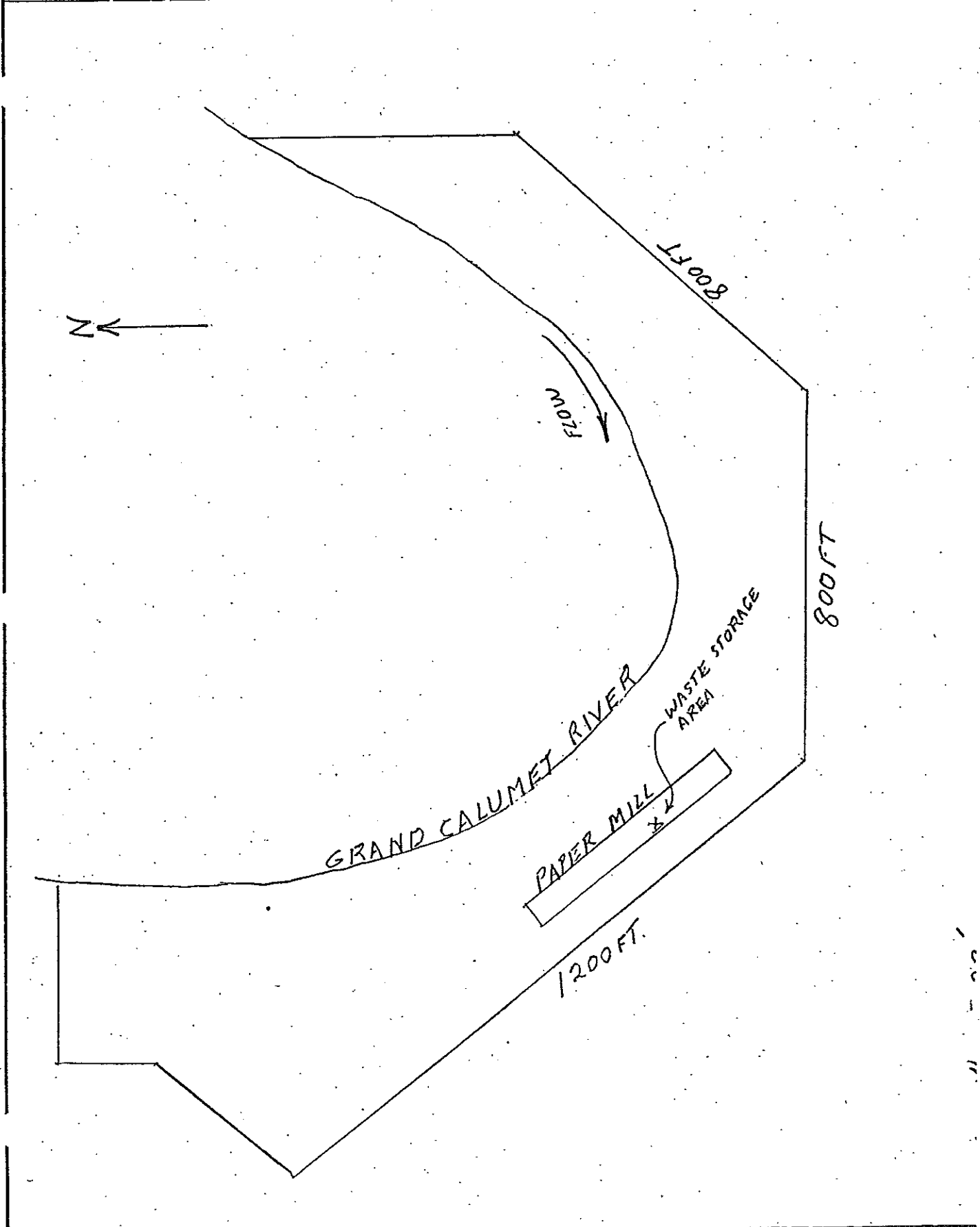
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

V. FACILITY DRAWING (see page 4)





OCTOBER 20, 1980
GEORGIA PACIFIC CORPORATION
GARY, INDIANA .



Georgia-Pacific Corporation

133 Peachtree Street, N.E.
P.O. Box 105605
Atlanta, Georgia 30348
Telephone (404) 521-4000

November 23, 1983

Express Mail

Donna See me

Environmental Protection Agency
Region V RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Attention: Karl J. Klepitsch, Jr.
Chief Waste Management Branch

Subject: Georgia-Pacific Corporation
Gary, Indiana Plant
EPA ID# IND 003 938 800
Permit Application Withdrawal

Gentlemen:

After a recent inspection of our Gary, Indiana, paper mill by the Indiana Hazardous Waste Management Branch, Georgia-Pacific was advised to seek rescission of that plant's interim status as a hazardous waste storage facility.

Because Georgia-Pacific has not stored hazardous wastes at the Gary, Indiana, paper mill, we hereby request that the mill's interim status be rescinded and your records changed accordingly.

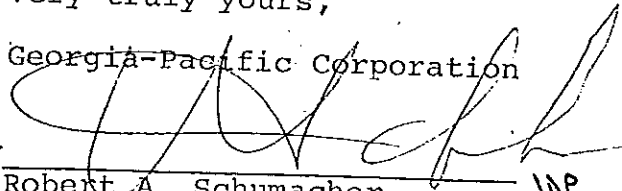
Any questions regarding this matter should be directed to either S. J. Furstein, Environmental Engineer or G. Fred McCaig, Manager of Environmental Engineering. Both Mr. Furstein and Mr. McCaig are located at our Atlanta, Georgia, headquarters. Telephone 404-521-4000.

Thank you.

Very truly yours,

Georgia-Pacific Corporation

By


Robert A. Schumacher
Executive Vice President-
Pulp and Paper

JAP

RAS:bh

cc: Messrs. James M. Hunt
G. Fred McCaig
Saul J. Furstein
K. J. Renshaw



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

AUG 6 1984

Robert A. Schumacher, Executive Vice President
Pulp & Paper, Georgia-Pacific Corp.
133 Peachtree St., N.E.
Atlanta, Georgia 30348

RE: Withdrawal of Part A (Protective Filing)
FACILITY NAME: Georgia-Pacific Corp., Gary Plant
U.S. EPA ID NO.: IND003938800

Dear Mr. Schumacher:

This is to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of November 23, 1983, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility has not, since November 19, 1980, treated, stored, or disposed of hazardous waste, and this permit application was a protective filing. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must still comply with all applicable State and local requirements.

You will retain your U.S. EPA Identification number, if you notified as a generator or transporter of hazardous waste.

Please contact the Regulatory Analysis and Information Unit at (312) 886-6148 for assistance, if you have any questions. Please refer to "Withdrawal of Part A (Protective Filing)," in all correspondence on this matter.

Sincerely yours, 4

A handwritten signature in cursive script, reading "Karl J. Klepitsch, Jr.".

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: S.J. Furstein, Environmental Engineer
~~Ken Renshaw, Technical Director~~
ISBH



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

Ken Renshaw, Technical Director
Georgia-Pacific Corporation
Second Place and Waite Street
P. O. Box 4326
Gary, Indiana 46404

*DH
pet*

RE: Permit Application Withdrawal Letter
FACILITY NAME: Georgia-Pacific Corporation-Gary Plant
U.S. EPA ID NO.: IND 003 938 800

Dear Mr. Renshaw:

This is to acknowledge receipt of your letter of September 13, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: R. A. Schumacher, Senior Vice President

PLEASE NOTE

We have a new mailing address for all Region V RCRA activities.

RCRA ACTIVITIES
Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

The following RCRA activities should be submitted to the address above:

- a. Inquiries on ID numbers;
- b. Notification of Hazardous Waste Activity (EPA Form 8700-12);
- c. Part A of the RCRA treatment, storage, and/or disposal (TSD) facility permit application, Form 1 (EPA Form 3510-1) and Form 3 (EPA Form 3510-3);
- d. Part B of the RCRA TSD facility permit application;
- e. Additional information/revisions to b, c, and d.
- f. Manifest reports (exception, discrepancy and unmanifested waste);
- g. Financial responsibility documents; and
- h. Groundwater monitoring reports;
- i. Closure documents; and
- j. Annual reports.

You may get information and answers to specific questions relating to Interim Status Standards and the Federal hazardous waste management program in your State by calling (312) 353-2197 and asking for RCRA hazardous waste regulations assistance. Region V has numerous technical staff who are available to help industry comply with the hazardous waste regulations under RCRA. Trained professionals provide accurate, up-to-date general information on the regulations and also answer questions regarding specific problems.

Subpart G—Closure and Post-Closure

Source: 46 FR 2875, Jan. 12, 1981, unless otherwise noted.

§ 265.110 Applicability.

Except as § 265.1 provides otherwise:

(a) Sections 265.111 through 265.115 (which concern closure) apply to the owners and operators of all hazardous waste management facilities; and

(b) Sections 265.117 through 265.120 (which concern post-closure care) apply to the owners and operators of all hazardous waste disposal facilities.

§ 265.111 Closure performance standard.

The owner or operator must close his facility in a manner that:

(a) Minimizes the need for further maintenance, and

(b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.

§ 265.112 Closure plan; amendment of plan.

(a) By May 19, 1981, the owner or operator must have a written closure plan. He must keep a copy of the closure plan and all revisions to the plan at the facility until closure is completed and certified in accordance with § 265.115. This plan must identify the steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close the facility at the end of its intended operating life. The closure plan must include, at least:

(1) A description of how and when the facility will be partially closed, if applicable, and finally closed. The description must identify the maximum extent of the operation which will be unclosed during the life of the facility, and how the requirements of §§ 265.111, 265.113, 265.114, and 265.115 and the applicable closure requirements of §§ 265.197, 265.228, 265.280, 265.310, 265.351, 265.381, and 265.404 will be met;

(2) An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;

(3) A description of the steps needed to decontaminate facility equipment during closure; and

(4) An estimate of the expected year of closure and a schedule for final closure. The schedule must include, at a minimum, the total time required to close the facility and the time required for intervening closure activities which will allow tracking of the progress of closure. (For example, in the case of a landfill, estimates of the time required to treat and dispose of all waste inventory and of the time required to place a final cover must be included.)

(b) The owner or operator may amend his closure plan at any time during the active life of the facility. (The active life of the facility is that period during which wastes are periodically received.) The owner or operator must amend the plan whenever changes in operating plans or facility design affect the closure plan, or whenever there is a change in the expected year of closure of the facility. The plan must be amended within 60 days of the changes.

(c) The owner or operator must submit his closure plan to the Regional Administrator at least 180 days before the date he expects to begin closure. The owner or operator must submit his closure plan to the Regional Administrator no later than 15 days after:

(1) Termination of interim status (except when a permit is issued to the facility simultaneously with termination of interim status; or

(2) Issuance of a judicial decree or compliance order under Section 3008 of RCRA to cease receiving wastes or close.

[Comment: The date when closure commences should be within 30 days after the date on which the owner or operator expects to receive the final volume of wastes.]

(d) The Regional Administrator will provide the owner or operator and the public, through a newspaper notice, the opportunity to submit written comments on the plan and request modifications of the plan within 30 days of the date of the notice. He will also, in response to a request or at his own discretion, hold a public hearing whenever such a hearing might clarify one or more issues concerning a closure plan. The Regional Administrator will give public notice of the hearing at least 30 days before it occurs.

(Public notice of the hearing may be given at the same time as notice of the opportunity for the public to submit written comments, and the two notices may be combined.) The Regional Administrator will approve, modify, or disapprove the plan within 90 days of its receipt. If the Regional Administrator does not approve the plan, the owner or operator must modify the plan or submit a new plan for approval within 30 days. The Regional Administrator will approve or modify this plan in writing within 60 days. If the Regional Administrator modifies the plan, this modified plan becomes the approved closure plan. The Regional Administrator's decision must assure that the approved closure plan is consistent with §§ 265.111, 265.113, 265.114, and 265.115 and the applicable requirements of §§ 265.197, 265.228, 265.280, 265.310, 265.351, 265.381 and 265.404. A copy of this modified plan must be mailed to the owner or operator. If the owner or operator plans to begin closure before November 19, 1981 he must submit the closure plan by May 19, 1981.

§ 265.113 Closure; time allowed for closure.

(a) Within 90 days after receiving the final volume of hazardous wastes, or 90 days after approval of the closure plan, if that is later, the owner or operator must treat, remove from the site, or dispose of on-site all hazardous wastes in accordance with the approved closure plan. The Regional Administrator may approve a longer period using the procedures under § 265.112(d) if the owner or operator demonstrates that:

(1)(i) The activities required to comply with this paragraph will, of necessity, take him longer than 90 days to complete; or

(ii)(A) The facility has the capacity to receive additional wastes;

(B) There is a reasonable likelihood that a person other than the owner or operator will recommence operation of the site; and

(C) Closure of the facility would be incompatible with continued operation of the site; and

(2) He has taken and will continue to take all steps to prevent threats to human health and the environment.

(b) The owner or operator must complete closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes or 180 days after approval of the closure plan, if that is later. The Regional Administrator may approve a longer closure period using the procedures under § 265.112(c) if the owner or operator demonstrates that:

(1) The closure activities will, of necessity, take him longer than 180 days to complete; or

(ii)(A) The facility has the capacity to receive additional waste;

(B) There is a reasonable likelihood that a person other than the owner or operator will recommence operation of the site;

(C) Closure of the facility would be incompatible with continued operation of the site; and

(2) He has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

[Comment: Under paragraphs (a)(1)(ii) and (b)(1)(ii), of this Section, if operation of the facility is recommenced, the Regional Administrator may defer completion of closure activities until the new operation is terminated]

§ 265.114 Disposal or decontamination of equipment.

When closure is completed, all facility equipment and structures must have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

§ 265.115 Certification of closure.

When closure is completed, the owner or operator must submit to the Regional Administrator certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION
230 SOUTH DEARBORN ST
CHICAGO ILLINOIS 60604

REPLY TO ATTENTION #3
5ENRME

Beverly G. Rowe, Attorney
Georgia-Pacific Corporation
Law Department
2310 Parklake Drive, N.E.
P.O. Box 105041
Atlanta, Georgia 30348

MAY 12 1981

MAY 12 1981

Re: Information Request Under
Section 308 of the Clean Water Act
and Section 3007 of the Resource
Conservation and Recovery Act

Dear Ms. Rowe:

Thank you for your prompt and complete response to the above referenced request.

Pursuant to our review of the material, we have decided to close our file on this matter. Thank you for your cooperation.

Very truly yours,


Sandra S. Gardebring
Director, Enforcement Division

cc: Oral H. Hert, Technical Secretary
Indiana Stream Pollution Control Board
1330 West Michigan Street
Indianapolis, Indiana 46206

Ken Renshaw, Technical Director
Georgia Pacific Corporation
P.O. Box 4326
Gary, Indiana 46402

EPA Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name Georgia-Pacific Corporation
Street 900 S.W. Fifth Avenue
City Portland State Oregon Zip Code 97204

Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site Georgia-Pacific Corporation, Gary Mill
Street 2nd Place and Waite Street
City Gary County Lake State Indiana Zip Code 46404

Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Renshaw, Kenneth J., Technical Director

Phone (219) 882-1640

Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) 1970 To (Year) 1970

Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item 1—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☒ Unknown
11. ☒ Other (Specify)

Mill Trash

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☒ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:

EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

[illegible]

Notification of Hazardous Waste Site

Side Two

Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☒ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) See "I" Below

Total Facility Waste Amount

cubic feet

gallons

Total Facility Area

square feet

acres

I Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☒ None

Note: Items Hand I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

See Attachment #1

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

Last February 25, we received a "Request for Information" from Region V of the Environmental Protection Agency.

This questionnaire concerned a site where some mill trash, including some metal drums, were buried ten years ago. We replied to the request and as the attached letter (Attachment #2) shows, the matter is now considered closed.

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name Chester A. Adamczyk

Street 2nd Place and Waite Street

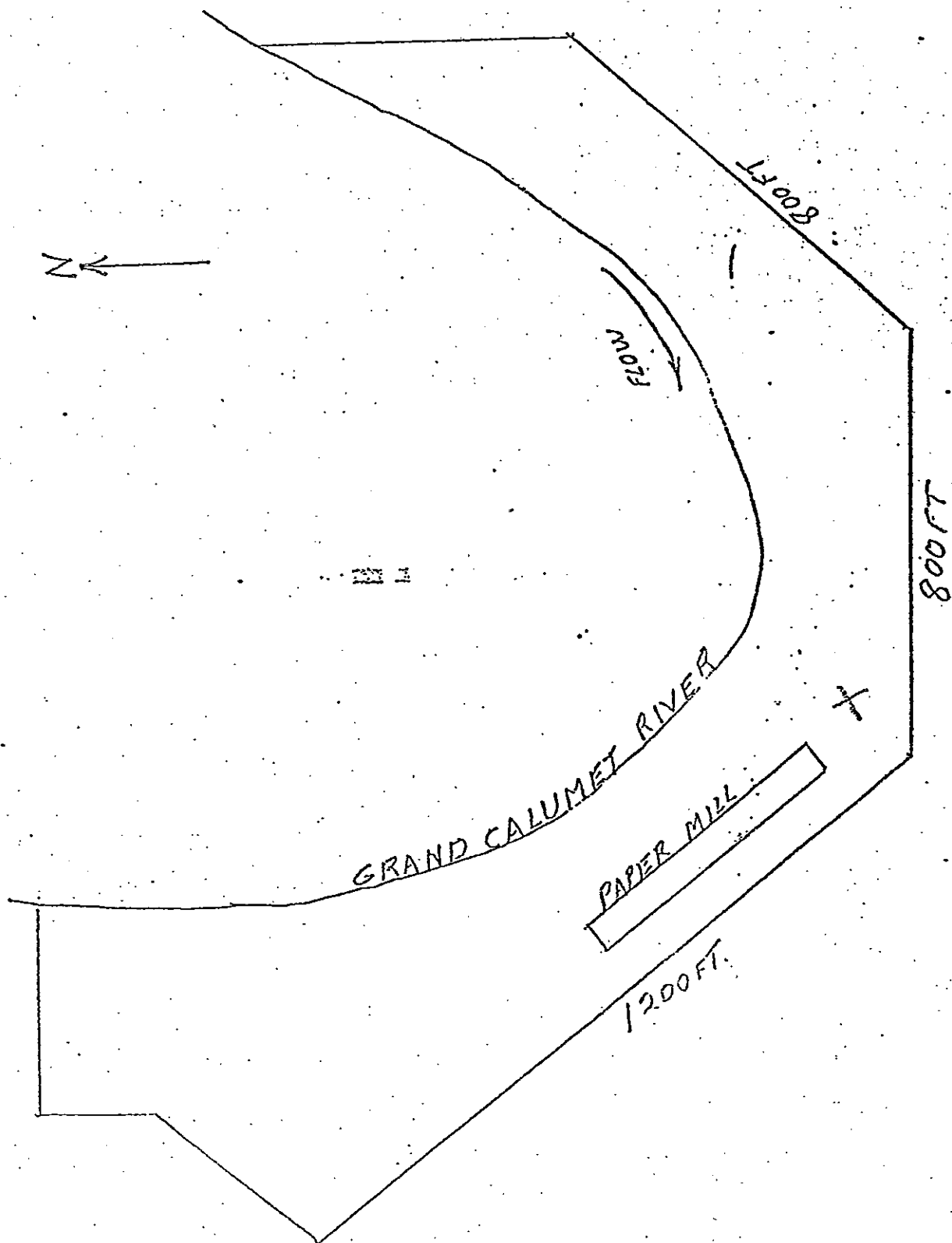
City Gary

State In. Zip Code 46404

Signature Chester Adamczyk

Date 6-5-81

- ☒ Owner, Present
- ☐ Owner, Past
- ☐ Transporter
- ☒ Operator, Present
- ☐ Operator, Past
- ☐ Other



SCALE 1" = 300'



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

IND003938800

REACKNOWLEDGEMENT

GEORGIA PACIFIC CORPORATION
PO BOX 4326
GARY

IN 46402

INSTALLATION ADDRESS

SECOND PLACE & WAITE STREET
GARY

IN 46402

EPA Form 8700-12A (4-80)

Attachment 6.5

SECTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

I.D. - FOR OFFICIAL USE ONLY									
1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

CHESTER S. ADAMCZYK
RESIDENT MANAGER

DATE SIGNED



Vol. IV, No. 3

October, 1980

Darien, Connecticut

Editor Marian T. Wilder

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An Equal Opportunity Employer

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Chester S. Adamczyk

STORY OF THE INDUSTRIAL TISSUE DIVISION

The history of the Gary and Tomahawk mills is so entwined with the history of the paper towel dispenser that we must go all the way back to the first World War. Until that time practically all towels were cloth. A few paper towels were available but were used mainly for wiping up materials that would damage cloth towels.

The paper was weak, lost its absorbency rapidly, was harsh and had no wet strength. And paper wasn't cheap—there was too little paper towel business to justify investments by paper mills to lower the cost. During the war however the disposability of paper towels gave them an advantage, thus substantially increasing their use.

Paper Towel Cabinet Developed

A cloth roll towel had been developed by the Steiner Corporation of America and they felt they could probably also make a good roll paper towel dispenser using the same waste-saving time stop that had been so successful in the continuous cloth towel cabinet. An acceptable model was finished in 1935 and the first paper towel cabinet was shipped in April, 1936. The main problem of lack of wet strength had been solved in 1933 by a man named Corbin who developed a process that gave the paper strength when wet.

Gary Mill Built in 1948

And now let's pick up the story of the Gary mill. In 1948 ground was broken for the mill in Gary, Indiana. However this one was not to produce steel, but paper. It was started as the Gary Paper Mill and it manufactured newsprint on a used

machine at a speed of 300 feet per minute, which was sold to the Gary Post Tribune, Hammond Times and Chicago Tribune.

Gary Paper Mill Sold to Beverly Mills

In 1953 the mill changed hands and became known as Beverly Mills. The paper machine was used for manufacturing newsprint and then wall-paper which was sold to local as well as Chicago buyers.

Steiner Investigates Gary Facility

In 1955 Steiner Corporation of America was approached about buying Beverly Mills. The paper towel business had become so successful for Steiner that it was necessary to find another source for paper. Paul Jespersen, designer/engineer with Steiner, was working diligently on the assignment of locating another mill. He tells about the original contact in his own words:

"Early in 1955 two men came to see me in Chicago. They wanted to talk about selling jumbo roll to Steiner from their paper mill in Gary, Indiana. They had seen our dispensers, had found out that we were operating converting plants and had gone to the trouble of making a trial run of paper toweling which they showed me. This was a surprise to me. I thought I had been in every towel mill in the east and couldn't believe there was one right at our back door in Gary."

"They explained that the mill had been built to produce newsprint from waste paper, that they were now making wallpaper and that they could use some extra business. The mill consisted of one paper machine 110" wide running at 300 feet per minute, plus two pulpers and a sidehill washer. At this speed the machine could produce only 18 tons per day, or about 400 tons per month — only half our needs. But the mill seemed to have possibilities."

"We felt that the machine would have to be brought up to a speed of 800 feet per minute but that if we could start out at 600 feet we could live with it. The owners told me that the machine could run at that speed. They invited me to see this for myself."

Attachment 3.2

"When I arrived at the mill the machine was running at 300 feet but I was told I could operate the machine myself, turning up the rheostat dial until the meter indicated 600 feet per minute. There was no paper on the machine but this was all right. All I wanted to know was if the machine would actually run at the higher speed.

"Gradually I began to turn up the dial. We got up to 400 feet without any noticeable trouble but shortly thereafter the floor began to vibrate. When we hit 500, suddenly a loud slapping noise developed. The various segments of the machine were belt driven from a lineshaft in the basement; at the higher speeds the belt splicings were being thrown against the concrete wells where the belt went through the floor. But I was determined to get up to 600 so I kept inching ahead!

"By the time we actually hit the 600 mark all the belts were hammering violently, the windows were rattling and the floor was dancing... but the machine itself seemed all right. When I turned to nod my approval to the owners and the mill crew, I discovered that they had all disappeared. I was the only man left in the building!!"

Mill Bought by Steiner

And so the Gary mill was purchased by Steiner in 1955 and converted from newsprint and wallpaper to toweling. In 1956 a converting department was started to convert the industrial toweling into rolls and folded towels. In 1959 the converting equipment was moved to Albany, New York and the Steiner mill produced toweling stock only.

In January, 1962 Steiner transferred equipment from Kaukauna, Wisconsin to Gary and the paper machine produced both industrial toweling and toilet tissue. As the years went by the paper business was still generating cash but not enough to properly modernize the mill and keep up with the times.

Georgia-Pacific Buys Gary Mill

In 1964 the Gary mill was leased to Georgia-Pacific with an option to buy and it was actually purchased by G-P in 1965. A major expansion was started including a new warehouse, expansion of the converting department and rebuild of the paper machine.



Gary Mill

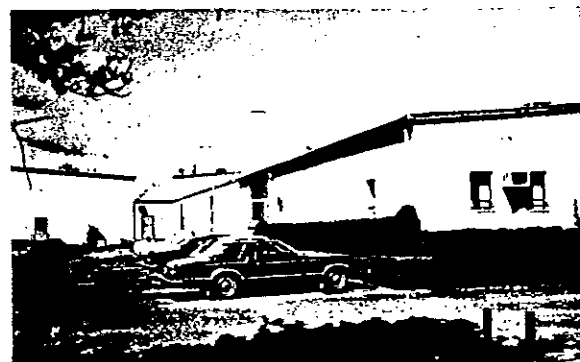
Many Improvements Made by G-P

Georgia-Pacific also installed a new waste water treatment system and was the first company in heavily industrialized northwest Indiana to meet water quality discharge standards. In 1970 G-P made further improvements, installing a new felt section and a new 12 foot yankee. Eventually new after-dryers and a sectional SCR drive on the rejuvenated machine were added. Today the machine produces 80 tons per day of bleached and unbleached grades of industrial toweling.

The converting department also was an area where extensive improvements were made. New towel winders and folding machines were installed which increased production from 1,000 cases per day to today's production of 5,000 cases per day.

There is perhaps not a more modern or efficient industrial paper towel converting department in the world than the one we have at Gary.

Tomahawk Mill History



Tomahawk

(Important: Type or print; read instructions before completing form.)



U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORMSection 313 of the Emergency Planning and Community Right-to-Know Act of 1986,
also known as Title III of the Superfund Amendments and Reauthorization Act

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response, with an average of 32 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch (PM-223), US EPA, 401 M St., SW, Washington, D.C. 20460 Attn: TRU Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, D.C. 20503.

EPA FORM
R**PART I.
FACILITY
IDENTIFICATION
INFORMATION**

(This space for your optional use.)

FORMALDEHYDE

1.	1.1 Are you claiming the chemical identity on page 3 trade secret? <input type="checkbox"/> Yes (Answer question 1.2; Attach substantiation forms.) <input checked="" type="checkbox"/> No (Do not answer 1.2; Go to question 1.3.)	1.2 If "Yes" in 1.1, is this copy: <input type="checkbox"/> Sanitized <input type="checkbox"/> Unsanitized	1.3 Reporting Year 19 <u>89</u>
----	--	---	------------------------------------

2. CERTIFICATION (Read and sign after completing all sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official

JOSEPH S. MORRILL - RESIDENT MANAGER

Signature

Joseph S. Morrill

Date signed

6-21-90

3. FACILITY IDENTIFICATION

3.1	Facility or Establishment Name GEORGIA-PACIFIC CORPORATION	
	Street Address 2ND PLACE & WAITE STREET	
	City GARY	County LAKE
	State INDIANA	Zip Code 46404
	TRI Facility Identification Number 46404GRGPC2NDPL	

WHERE TO SEND COMPLETED FORMS:

1. EPCRA REPORTING CENTER
P.O. BOX 29779 223779
WASHINGTON, DC 20026-3779
ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See Instructions in Appendix G)

3.2	This report contains information for (Check only one): a. <input checked="" type="checkbox"/> An entire facility b. <input type="checkbox"/> Part of a facility.					
3.3	Technical Contact KENNETH J. RENSHAW				Telephone Number (include area code) (219) 882-1640	
3.4	Public Contact JOSEPH S. MORRILL				Telephone Number (include area code) (219) 882-1640	
3.5	SIC Code (4 digit) a. 2621	b.	c.	d.	e.	f.
3.6	Latitude Degree Minutes Seconds 41 33 60			Longitude Degree Minutes Seconds 87 33 30		
3.7	Dun & Bradstreet Number(s) a. 00-393- 800 b.					
3.8	EPA Identification Number(s) (RCRA I.D. No.) a. IND003938800 b.					
3.9	NPDES Permit Number(s) a. N/A b.					
3.10	Receiving Streams or Water Bodies (enter one name per box)					
	a. N/A b.					
	c. d.					
	e. f.					
3.11	Underground Injection Well Code (UIC) Identification Number(s) a. N/A b.					

4. PARENT COMPANY INFORMATION

4.1	Name of Parent Company GEORGIA-PACIFIC CORPORATION	4.2	Parent Company's Dun & Bradstreet Number 00-902-0777
-----	---	-----	---

(Important: Type or print; read instructions before completing form.)



EPA FORM R
**PART II. OFF-SITE LOCATIONS TO WHICH TOXIC
 CHEMICALS ARE TRANSFERRED IN WASTES**

(This space for your optional use.)

1989
 FORMALDEHYDE

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW name GARY SANITARY DISTRICT		1.2 POTW name N/A	
Street Address 3600 WEST 3RD AVENUE		Street Address	
City GARY	County LAKE	City	County
State INDIANA	Zip 46406	State	Zip

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 Off-site location name GARY AIRPORT AUTHORITY		2.2 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address 6131 INDUSTRIAL HIGHWAY		Street Address	
City GARY	County LAKE	City	County
State INDIANA	Zip 46406	State	Zip
Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No	

2.3 Off-site location name N/A		2.4 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No		Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No	
2.5 Off-site location name N/A		2.6 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No		Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Check if additional pages of Part II are attached. How many? _____			



(Important: Type or print; read instructions before completing form.)

Page 3 of 5



EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use.)

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FORMALDEHYDE

1. CHEMICAL IDENTITY (Do not complete this section if you complete Section 2.)					
1.1	[Reserved]				
1.2	CAS Number (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.) 50-00-0				
1.3	Chemical or Chemical Category Name (Enter only one name exactly as it appears on the 313 list.) FORMALDEHYDE				
1.4	Generic Chemical Name (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)				
2. MIXTURE COMPONENT IDENTITY (Do not complete this section if you complete Section 1.) Generic Chemical Name Provided by Supplier (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)					
3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)					
3.1	Manufacture the chemical: a. <input type="checkbox"/> Produce b. <input type="checkbox"/> Import	If produce or import: c. <input type="checkbox"/> For on-site use/processing d. <input type="checkbox"/> For sale/distribution e. <input type="checkbox"/> As a byproduct f. <input type="checkbox"/> As an impurity			
3.2	Process the chemical: a. <input type="checkbox"/> As a reactant d. <input type="checkbox"/> Repackaging only	b. <input type="checkbox"/> As a formulation component c. <input type="checkbox"/> As an article component			
3.3	Otherwise use the chemical: a. <input type="checkbox"/> As a chemical processing aid	b. <input type="checkbox"/> As a manufacturing aid c. <input checked="" type="checkbox"/> Ancillary or other use			
4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR <input type="checkbox"/> 04 (enter code)					
5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE					
You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)		A. Total Release (pounds/year)		B. Basis of Estimate (enter code)	C. % From Stormwater
		A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.1 Fugitive or non-point air emissions	5.1a	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.1b <input type="checkbox"/>	
5.2 Stack or point air emissions	5.2a	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	16,000	5.2b <input type="checkbox"/>	
5.3 Discharges to receiving streams or water bodies (Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.1 <input type="checkbox"/>	5.3.1a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.3.1b <input type="checkbox"/>	5.3.1c %
	5.3.2 <input type="checkbox"/>	5.3.2a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.3.2b <input type="checkbox"/>	5.3.2c %
	5.3.3 <input type="checkbox"/>	5.3.3a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.3.3b <input type="checkbox"/>	5.3.3c %
5.4 Underground injection on-site	5.4a	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.4b <input type="checkbox"/>	
5.5 Releases to land on-site	5.5.1 Landfill	5.5.1a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.5.1b <input type="checkbox"/>	
	5.5.2 Land treatment/application farming	5.5.2a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.5.2b <input type="checkbox"/>	
	5.5.3 Surface impoundment	5.5.3a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.5.3b <input type="checkbox"/>	
	5.5.4 Other disposal	5.5.4a <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	N/A	5.5.4b <input type="checkbox"/>	
[] (Check if additional information is provided on Part IV-Supplemental Information.)					

Attachment 2.4

(Important: Type or print; read instructions before completing form.)



EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION
 (continued)

(This space for your optional use.)

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6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/year)		B. Basis of Estimate (enter code)	C. Type of Treatment/Disposal (enter code)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1.1 Discharge to POTW (enter location number from Part I, Section 1.) <input type="text" value="1"/> <input type="text" value="1"/> [] [] []	68,000	6.1.1b <input type="text" value="0"/>		
6.2.1 Other off-site location (enter location number from Part I, Section 2.) <input type="text" value="2"/> <input type="text" value="1"/> [] [] []	400	6.2.1b <input type="text" value="0"/>	6.2.1c <input type="text" value="M"/> <input type="text" value="7"/> <input type="text" value="2"/>	
6.2.2 Other off-site location (enter location number from Part I, Section 2.) <input type="text" value="2"/> <input type="text" value="1"/> [] [] []		6.2.2b <input type="text"/>	6.2.2c <input type="text" value="M"/> <input type="text"/> <input type="text"/>	
6.2.3 Other off-site location (enter location number from Part I, Section 2.) <input type="text" value="2"/> <input type="text"/> [] [] []		6.2.3b <input type="text"/>	6.2.3c <input type="text" value="M"/> <input type="text"/> <input type="text"/>	

[] (Check if additional information is provided on Part IV-Supplemental Information.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.

A. General Wastestream (enter code)	B. Treatment Method (enter code)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7.1a N/A <input type="checkbox"/>	7.1b <input type="text"/> <input type="text"/> <input type="text"/>	7.1c <input type="checkbox"/>	7.1d []	7.1e %	7.1f [] []
7.2a <input type="checkbox"/>	7.2b <input type="text"/> <input type="text"/> <input type="text"/>	7.2c <input type="checkbox"/>	7.2d []	7.2e %	7.2f [] []
7.3a <input type="checkbox"/>	7.3b <input type="text"/> <input type="text"/> <input type="text"/>	7.3c <input type="checkbox"/>	7.3d []	7.3e %	7.3f [] []
7.4a <input type="checkbox"/>	7.4b <input type="text"/> <input type="text"/> <input type="text"/>	7.4c <input type="checkbox"/>	7.4d []	7.4e %	7.4f [] []
7.5a <input type="checkbox"/>	7.5b <input type="text"/> <input type="text"/> <input type="text"/>	7.5c <input type="checkbox"/>	7.5d []	7.5e %	7.5f [] []
7.6a <input type="checkbox"/>	7.6b <input type="text"/> <input type="text"/> <input type="text"/>	7.6c <input type="checkbox"/>	7.6d []	7.6e %	7.6f [] []
7.7a <input type="checkbox"/>	7.7b <input type="text"/> <input type="text"/> <input type="text"/>	7.7c <input type="checkbox"/>	7.7d []	7.7e %	7.7f [] []
7.8a <input type="checkbox"/>	7.8b <input type="text"/> <input type="text"/> <input type="text"/>	7.8c <input type="checkbox"/>	7.8d []	7.8e %	7.8f [] []
7.9a <input type="checkbox"/>	7.9b <input type="text"/> <input type="text"/> <input type="text"/>	7.9c <input type="checkbox"/>	7.9d []	7.9e %	7.9f [] []
7.10a <input type="checkbox"/>	7.10b <input type="text"/> <input type="text"/> <input type="text"/>	7.10c <input type="checkbox"/>	7.10d []	7.10e %	7.10f [] []

[] (Check if additional information is provided on Part IV-Supplemental Information.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION

(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. Type of Modification (enter code)	B. Quantity of the Chemical in Wastes Prior to Treatment or Disposal	C. Index	D. Reason for Action (enter code)									
<input type="text" value="M"/> <input type="text"/>	<table border="0"> <tr> <td>Current reporting year (pounds/year)</td> <td>Prior year (pounds/year)</td> <td>Or percent change (Check (+) or (-))</td> </tr> <tr> <td><input type="text"/></td> <td><input type="text"/></td> <td><input type="text"/> + <input type="text"/> %</td> </tr> <tr> <td></td> <td></td> <td><input type="text"/> - <input type="text"/> %</td> </tr> </table>	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-))	<input type="text"/>	<input type="text"/>	<input type="text"/> + <input type="text"/> %			<input type="text"/> - <input type="text"/> %	<input type="text"/> <input type="text"/>	<input type="text" value="R"/> <input type="text"/>
Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-))										
<input type="text"/>	<input type="text"/>	<input type="text"/> + <input type="text"/> %										
		<input type="text"/> - <input type="text"/> %										



EPA FORM R PART IV. SUPPLEMENTAL INFORMATION

Use this section if you need additional space for answers to questions in Part III.
 Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 5.1.2, 7.11)

(This space for your optional use.)

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ADDITIONAL INFORMATION ON RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE (Part III, Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Release (pounds/year)		B. Basis of Estimate (enter code in box provided)	C. % From Stormwater
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.3 Discharges to receiving streams or water bodies 5.3. <input type="checkbox"/> N/A	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c %
(Enter letter code for stream from Part I Section 3.10 in the box provided.) 5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c %
5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c %

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS (Part III, Section 6)

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/year)		B. Basis of Estimate (enter code in box provided)	C. Type of Treatment/Disposal (enter code in box provided)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1. Discharge to POTW (enter location number from Part I, Section 1.) <input type="checkbox"/> 1	[] [] []		6.1. <input type="checkbox"/> b	
6.2. Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/>
6.2. Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/>
6.2. Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/>

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)

A. General Wastestream (enter code in box provided)	B. Treatment Method (enter code in box provided)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7. <input type="checkbox"/> N/A a	7. <input type="checkbox"/> b	7. <input type="checkbox"/> c	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a	7. <input type="checkbox"/> b	7. <input type="checkbox"/> c	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a	7. <input type="checkbox"/> b	7. <input type="checkbox"/> c	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a	7. <input type="checkbox"/> b	7. <input type="checkbox"/> c	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a	7. <input type="checkbox"/> b	7. <input type="checkbox"/> c	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a	7. <input type="checkbox"/> b	7. <input type="checkbox"/> c	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a	7. <input type="checkbox"/> b	7. <input type="checkbox"/> c	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a	7. <input type="checkbox"/> b	7. <input type="checkbox"/> c	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []

(Important: Type or print; read instructions before completing form.)



EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use.)
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1. CHEMICAL IDENTITY (Do not complete this section if you complete Section 2.)

1.1 [Reserved]

1.2 CAS Number (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.)
 N/A

1.3 Chemical or Chemical Category Name (Enter only one name exactly as it appears on the 313 list.)
 GLYCOL ETHERS, 2 BUTOXY - 1- ETHANOL

1.4 Generic Chemical Name (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

2. MIXTURE COMPONENT IDENTITY (Do not complete this section if you complete Section 1.)

Generic Chemical Name Provided by Supplier (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)
 SOLVOX SPECIAL 261

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)

3.1 Manufacture the chemical:
 a. ☐ Produce
 b. ☐ Import
 If produce or import:
 c. ☐ For on-site use/processing
 e. ☐ As a byproduct
 d. ☐ For sale/distribution
 f. ☐ As an impurity

3.2 Process the chemical:
 a. ☐ As a reactant
 b. ☐ As a formulation component
 c. ☐ As an article component
 d. ☐ Repackaging only

3.3 Otherwise use the chemical:
 a. ☐ As a chemical processing aid
 b. ☐ As a manufacturing aid
 c. ☒ Ancillary or other use

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR

(enter code)

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)

		A. Total Release (pounds/year)		B. Basis of Estimate (enter code)	C. % From Stormwater
		A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.1 Fugitive or non-point air emissions	5.1a	[] [] [] []	N/A	5.1b <input type="checkbox"/>	
5.2 Stack or point air emissions	5.2a	[] [] [] []	N/A	5.2b <input type="checkbox"/>	
5.3 Discharges to receiving streams or water bodies	5.3.1 <input type="checkbox"/>	5.3.1a [] [] [] []	N/A	5.3.1b <input type="checkbox"/>	5.3.1c %
(Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.2 <input type="checkbox"/>	5.3.2a [] [] [] []	N/A	5.3.2b <input type="checkbox"/>	5.3.2c %
	5.3.3 <input type="checkbox"/>	5.3.3a [] [] [] []	N/A	5.3.3b <input type="checkbox"/>	5.3.3c %
5.4 Underground Injection on-site	5.4a	[] [] [] []	N/A	5.4b <input type="checkbox"/>	
5.5 Releases to land on-site	5.5.1a	[] [] [] []	N/A	5.5.1b <input type="checkbox"/>	
5.5.1 Landfill	5.5.2a	[] [] [] []	N/A	5.5.2b <input type="checkbox"/>	
5.5.2 Land treatment/application farming	5.5.3a	[] [] [] []	N/A	5.5.3b <input type="checkbox"/>	
5.5.3 Surface impoundment	5.5.4a	[] [] [] []	N/A	5.5.4b <input type="checkbox"/>	
5.5.4 Other disposal					

[] (Check if additional information is provided on Part IV-Supplemental Information.)

Attachment 2.2

(Important: Type or print; read instructions before completing form.)



EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION
 (continued)

(This space for your optional use.)

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6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/year)		B. Basis of Estimate (enter code)	C. Type of Treatment/Disposal (enter code)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1.1 Discharge to POTW (enter location number from Part I, Section 1.) <input type="checkbox"/> <input type="checkbox"/> [] [] []	1340	6.1.1b <input type="checkbox"/> 0		
6.2.1 Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> <input type="checkbox"/> [] [] []	10	6.2.1b <input type="checkbox"/> 0	6.2.1c <input type="checkbox"/> M <input type="checkbox"/> 7 <input type="checkbox"/> 2	
6.2.2 Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> <input type="checkbox"/> [] [] []		6.2.2b <input type="checkbox"/>	6.2.2c <input type="checkbox"/> M <input type="checkbox"/> <input type="checkbox"/>	
6.2.3 Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> <input type="checkbox"/> [] [] []		6.2.3b <input type="checkbox"/>	6.2.3c <input type="checkbox"/> M <input type="checkbox"/> <input type="checkbox"/>	

[] (Check if additional information is provided on Part IV-Supplemental Information.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.

A. General Wastestream (enter code)	B. Treatment Method (enter code)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes, No
7.1a <input type="checkbox"/>	7.1b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.1c <input type="checkbox"/>	7.1d []	7.1e %	7.1f [] []
7.2a <input type="checkbox"/>	7.2b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.2c <input type="checkbox"/>	7.2d []	7.2e %	7.2f [] []
7.3a <input type="checkbox"/>	7.3b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.3c <input type="checkbox"/>	7.3d []	7.3e %	7.3f [] []
7.4a <input type="checkbox"/>	7.4b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.4c <input type="checkbox"/>	7.4d []	7.4e %	7.4f [] []
7.5a <input type="checkbox"/>	7.5b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.5c <input type="checkbox"/>	7.5d []	7.5e %	7.5f [] []
7.6a <input type="checkbox"/>	7.6b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.6c <input type="checkbox"/>	7.6d []	7.6e %	7.6f [] []
7.7a <input type="checkbox"/>	7.7b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.7c <input type="checkbox"/>	7.7d []	7.7e %	7.7f [] []
7.8a <input type="checkbox"/>	7.8b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.8c <input type="checkbox"/>	7.8d []	7.8e %	7.8f [] []
7.9a <input type="checkbox"/>	7.9b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.9c <input type="checkbox"/>	7.9d []	7.9e %	7.9f [] []
7.10a <input type="checkbox"/>	7.10b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7.10c <input type="checkbox"/>	7.10d []	7.10e %	7.10f [] []

[] (Check if additional information is provided on Part IV-Supplemental Information.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION
 (Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. Type of Modification (enter code)	B. Quantity of the Chemical in Wastes Prior to Treatment or Disposal		C. Index	D. Reason for Action (enter code)
<input type="checkbox"/> M	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-)) <input type="checkbox"/> + <input type="checkbox"/> - %	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> R



EPA FORM R PART IV. SUPPLEMENTAL INFORMATION

Use this section if you need additional space for answers to questions in Part III.
Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

(This space for your optional use.)

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ADDITIONAL INFORMATION ON RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE (Part III, Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Release (pounds/year)		B. Basis of Estimate (enter code in box provided)	C. % From Stormwater
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.3 Discharges to receiving streams or water bodies 5.3. <input type="checkbox"/> N/A	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c %
(Enter letter code for stream from Part I Section 3.10 in the box provided.) 5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c %
5.3. <input type="checkbox"/>	5.3. <input type="checkbox"/> a [] [] []		5.3. <input type="checkbox"/> b	5.3. <input type="checkbox"/> c %


ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS (Part III, Section 6)

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/year)		B. Basis of Estimate (enter code in box provided)	C. Type of Treatment/Disposal (enter code in box provided)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1. Discharge to POTW (enter location number from Part I, Section 1.) <input type="checkbox"/> 1	[] [] []		6.1. <input type="checkbox"/> b	
6.2. Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/> <input type="checkbox"/>
6.2. Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/> <input type="checkbox"/>
6.2. Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2	[] [] []		6.2. <input type="checkbox"/> b	6.2. <input type="checkbox"/> c M <input type="checkbox"/> <input type="checkbox"/>

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)

A. General Wastestream (enter code in box provided)	B. Treatment Method (enter code in box provided)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7. N/A <input type="checkbox"/> a	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []
7. <input type="checkbox"/> a <input type="checkbox"/>	7. <input type="checkbox"/> b <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	7. <input type="checkbox"/> c <input type="checkbox"/>	7. <input type="checkbox"/> d []	7. <input type="checkbox"/> e %	7. <input type="checkbox"/> f [] []

(Major ant: Type or print; read instructions before completing form.)

 EPA U.S. Environmental Protection Agency TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act		Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response, with an average of 32 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch (PM-223), US EPA, 401 M St., SW, Washington, D.C. 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, D.C. 20503.
EPA FORM R	PART I. FACILITY IDENTIFICATION INFORMATION (This space for your optional use.) GLYCOL ETHERS	

1.1 Are you claiming the chemical identity on page 3 trade secret? <input type="checkbox"/> Yes (Answer question 1.2: Attach substantiation forms.) <input checked="" type="checkbox"/> No (Do not answer 1.2: Go to question 1.3.)	1.2 If "Yes" in 1.1, is this copy: <input type="checkbox"/> Sanitized <input type="checkbox"/> Unsanitized	1.3 Reporting Year 19 89
---	---	------------------------------------

2. CERTIFICATION (Read and sign after completing all sections.)
 I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official:
JOSEPH S. MORRILL - RESIDENT MANAGER

Signature: *Joseph S. Morrill* Date signed: **6-21-90**

3. FACILITY IDENTIFICATION Facility or Establishment Name GEORGIA-PACIFIC CORPORATION Street Address 2ND PLACE & WAITE STREET City GARY County LAKE State INDIANA Zip Code 46404 TRI Facility Identification Number 46404GRGPC2NDPL	WHERE TO SEND COMPLETED FORMS: 1. EPCRA REPORTING CENTER P.O. BOX 29779 223779 WASHINGTON, DC 20026-3779 ATTN: TOXIC CHEMICAL RELEASE INVENTORY 2. APPROPRIATE STATE OFFICE (See Instructions in Appendix G)
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3.2 This report contains information for (Check only one): a. <input checked="" type="checkbox"/> An entire facility b. <input type="checkbox"/> Part of a facility.	Technical Contact KENNETH J. RENSHAW Telephone Number (include area code) (219) 882-1640
Public Contact JOSEPH S. MORRILL Telephone Number (include area code) (219) 882-1640	
3.5 SIC Code (4 digit) 2621	
3.6 Latitude Degrees 41 Minutes 33 Seconds 60 Longitude Degrees 87 Minutes 33 Seconds 30	
3.7 Dun & Bradstreet Number(s) 00-393-1800	
3.8 EPA Identification Number(s) (RCRA I.D. No.) IND003938800	
3.9 NPDES Permit Number(s) N/A	
3.10 Receiving Streams or Water Bodies (enter one name per box) N/A	
3.11 Underground Injection Well Code (UIC) Identification Number(s) N/A	

4. PARENT COMPANY INFORMATION	
4.1 Name of Parent Company GEORGIA-PACIFIC CORPORATION	4.2 Parent Company's Dun & Bradstreet Number 00-902-0777



EPA FORM R
PART II. OFF-SITE LOCATIONS TO WHICH TOXIC
CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use.)

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GLYCOL ETHERS

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW name GARY SANITARY DISTRICT		1.2 POTW name N/A	
Street Address 3600 WEST 3RD AVENUE		Street Address	
City GARY	County LAKE	City	County
State INDIANA	Zip 46406	State	Zip

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 Off-site location name GARY AIRPORT AUTHORITY		2.2 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address 6131 INDUSTRIAL HIGHWAY		Street Address	
City GARY	County LAKE	City	County
State INDIANA	Zip 46406	State	Zip
Is location under control of reporting facility or parent company? [] Yes [X] No		Is location under control of reporting facility or parent company? [] Yes [] No	

2.3 Off-site location name N/A		2.4 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	
2.5 Off-site location name N/A		2.6 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	
<input type="checkbox"/> Check if additional pages of Part II are attached. How many? _____			

(Important: Type or print; read instructions before completing form.)



U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

**EPA FORM
R****PART I.
FACILITY
IDENTIFICATION
INFORMATION**

(This space for your optional use.)

PHOSPHORIC ACID

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response, with an average of 32 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch (PM-223), US EPA, 401 M St., SW, Washington, D.C. 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, D.C. 20503.

1.	1.1 Are you claiming the chemical identity on page 3 trade secret? [] Yes (Answer question 1.2: Attach substantiation forms.) [X] No (Do not answer 1.2: Go to question 1.3.)	1.2 If "Yes" in 1.1, is this copy: [] Sanitized [] Unsanitized	1.3 Reporting Year 19 89
----	---	---	-----------------------------

2. CERTIFICATION (Read and sign after completing all sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official

JOSEPH S. MORRILL - RESIDENT MANAGER

Signature

Joseph S. Morrill

Date signed

6-21-90**3. FACILITY IDENTIFICATION**

3.1	Facility or Establishment Name GEORGIA-PACIFIC CORPORATION	
	Street Address 2ND PLACE & WAITE STREET	
	City GARY	County LAKE
	State INDIANA	Zip Code 46404
	TRI Facility Identification Number 46404GRGPC2NDPL	

WHERE TO SEND COMPLETED FORMS:

1. EPCRA REPORTING CENTER
P.O. BOX 20779 223779
WASHINGTON, DC 20026-3779
ATTN: TOXIC CHEMICAL RELEASE INVENTORY

2. APPROPRIATE STATE OFFICE (See instructions in Appendix G)

3.2	This report contains information for (Check only one): a. [X] An entire facility b. [] Part of a facility.					
3.3	Technical Contact KENNETH J. RENSHAW				Telephone Number (include area code) (219) 882-1640	
3.4	Public Contact JOSEPH S. MORRILL				Telephone Number (include area code) (219) 882-1640	
3.5	SIC Code (4 digit) a. 2621	b.	c.	d.	e.	f.
3.6	Latitude Degrees 41 Minutes 33 Seconds 60			Longitude Degrees 87 Minutes 33 Seconds 30		
3.7	Dun & Bradstreet Number(s) a. 00-393- 800				b.	
3.8	EPA Identification Number(s) (RCRA I.D. No.) a. IND003938800				b.	
3.9	NPDES Permit Number(s) a. N/A				b.	
3.10	Receiving Streams or Water Bodies (enter one name per box) a. N/A				b.	
	c.				d.	
	e.				f.	
	f.				g.	
3.11	Underground Injection Well Code (UIC) Identification Number(s) a. N/A				b.	

4. PARENT COMPANY INFORMATION

4.1	Name of Parent Company GEORGIA-PACIFIC CORPORATION	4.2	Parent Company's Dun & Bradstreet Number 00-902-0777
-----	--	-----	--

(Important: Type or print; read instructions before completing form.)



EPA FORM R
PART II. OFF-SITE LOCATIONS TO WHICH TOXIC
CHEMICALS ARE TRANSFERRED IN WASTES

(This space for your optional use.)

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 PHOSPHORIC ACID

1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW name GARY SANITARY DISTRICT		1.2 POTW name N/A	
Street Address 3600 WEST 3RD AVENUE		Street Address	
City GARY	County LAKE	City	County
State INDIANA	Zip 46406	State	Zip

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 Off-site location name GARY AIRPORT AUTHORITY		2.2 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address 6131 INDUSTRIAL HIGHWAY		Street Address	
City GARY	County LAKE	City	County
State INDIANA	Zip 46406	State	Zip
Is location under control of reporting facility or parent company? [] Yes [X] No		Is location under control of reporting facility or parent company? [] Yes [] No	

2.3 Off-site location name N/A		2.4 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	
2.5 Off-site location name N/A		2.6 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? [] Yes [] No		Is location under control of reporting facility or parent company? [] Yes [] No	
[] Check if additional pages of Part II are attached. How many? _____			



EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION

(This space for your optional use.)
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1. CHEMICAL IDENTITY (Do not complete this section if you complete Section 2.)									
1.1	[Reserved]								
1.2	CAS Number (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.) 7664-38-2								
1.3	Chemical or Chemical Category Name (Enter only one name exactly as it appears on the 313 list.) PHOSPHORIC ACID								
1.4	Generic Chemical Name (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)								
2. MIXTURE COMPONENT IDENTITY (Do not complete this section if you complete Section 1.)									
2.	Generic Chemical Name Provided by Supplier (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).) SOLVOX SPECIAL 261								
3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)									
3.1	Manufacture the chemical:		a. <input type="checkbox"/> Produce		c. <input type="checkbox"/> For on-site use/processing		d. <input type="checkbox"/> For sale/distribution		
			b. <input type="checkbox"/> Import		e. <input type="checkbox"/> As a byproduct		f. <input type="checkbox"/> As an impurity		
3.2	Process the chemical:		a. <input type="checkbox"/> As a reactant		b. <input type="checkbox"/> As a formulation component		c. <input type="checkbox"/> As an article component		
			d. <input type="checkbox"/> Repackaging only						
3.3	Otherwise use the chemical:		a. <input type="checkbox"/> As a chemical processing aid		b. <input type="checkbox"/> As a manufacturing aid		c. <input checked="" type="checkbox"/> Ancillary or other use		
4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR									
03 (enter code)									
5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE									
You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)				A. Total Release (pounds/year)		B. Basis of Estimate (enter code)	C. % From Stormwater		
				A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate				
5.1 Fugitive or non-point air emissions	5.1a	[] [] []	N/A	5.1b	<input type="checkbox"/>				
5.2 Stack or point air emissions	5.2a	[] [] []	N/A	5.2b	<input type="checkbox"/>				
5.3 Discharges to receiving streams or water bodies	5.3.1 <input type="checkbox"/>	5.3.1a [] [] []	N/A	5.3.1b	<input type="checkbox"/>	5.3.1c	%		
(Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.2 <input type="checkbox"/>	5.3.2a [] [] []	N/A	5.3.2b	<input type="checkbox"/>	5.3.2c	%		
	5.3.3 <input type="checkbox"/>	5.3.3a [] [] []	N/A	5.3.3b	<input type="checkbox"/>	5.3.3c	%		
5.4 Underground Injection on-site	5.4a	[] [] []	N/A	5.4b	<input type="checkbox"/>				
5.5 Releases to land on-site	5.5.1a	[] [] []	N/A	5.5.1b	<input type="checkbox"/>				
5.5.1 Landfill	5.5.2a	[] [] []	N/A	5.5.2b	<input type="checkbox"/>				
5.5.2 Land treatment/application farming	5.5.3a	[] [] []	N/A	5.5.3b	<input type="checkbox"/>				
5.5.3 Surface impoundment	5.5.4a	[] [] []	N/A	5.5.4b	<input type="checkbox"/>				
5.5.4 Other disposal									
[] (Check if additional information is provided on Part IV-Supplemental Information.)									

(Important: Type or print; read instructions before completing form.)



EPA FORM R
PART III. CHEMICAL-SPECIFIC INFORMATION
 (continued)

(This space for your optional use.)

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6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS					
You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/year)		B. Basis of Estimate (enter code)	C. Type of Treatment/Disposal (enter code)	
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate			
6.1.1 Discharge to POTW (enter location number from Part II, Section 1.)	1 [] [] []	0	6.1.1b [0]		
6.2.1 Other off-site location (enter location number from Part II, Section 2.)	2 [] [] []	0	6.2.1b [0]	6.2.1c [M] [7] [2]	
6.2.2 Other off-site location (enter location number from Part II, Section 2.)	2 [] [] []	N/A	6.2.2b []	6.2.2c [M] [] []	
6.2.3 Other off-site location (enter location number from Part II, Section 2.)	2 [] [] []	N/A	6.2.3b []	6.2.3c [M] [] []	

[] (Check if additional information is provided on Part IV-Supplemental Information.)

7. WASTE TREATMENT METHODS AND EFFICIENCY					
[X] Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.					
A. General Wastestream (enter code)	B. Treatment Method (enter code)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7.1a N/A []	7.1b [] [] []	7.1c []	7.1d [] []	7.1e %	7.1f [] [] []
7.2a []	7.2b [] [] []	7.2c []	7.2d [] []	7.2e %	7.2f [] [] []
7.3a []	7.3b [] [] []	7.3c []	7.3d [] []	7.3e %	7.3f [] [] []
7.4a []	7.4b [] [] []	7.4c []	7.4d [] []	7.4e %	7.4f [] [] []
7.5a []	7.5b [] [] []	7.5c []	7.5d [] []	7.5e %	7.5f [] [] []
7.6a []	7.6b [] [] []	7.6c []	7.6d [] []	7.6e %	7.6f [] [] []
7.7a []	7.7b [] [] []	7.7c []	7.7d [] []	7.7e %	7.7f [] [] []
7.8a []	7.8b [] [] []	7.8c []	7.8d [] []	7.8e %	7.8f [] [] []
7.9a []	7.9b [] [] []	7.9c []	7.9d [] []	7.9e %	7.9f [] [] []
7.10a []	7.10b [] [] []	7.10c []	7.10d [] []	7.10e %	7.10f [] [] []

[] (Check if additional information is provided on Part IV-Supplemental Information.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION				
(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)				
A. Type of Modification (enter code)	B. Quantity of the Chemical in Wastes Prior to Treatment or Disposal		C. Index	D. Reason for Action (enter code)
[M] []	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change (Check (+) or (-))	
			[] + [] - %	[R] []



(Important: Type or print; read instructions before completing form.)

Page 5 of 5



EPA FORM R
PART IV. SUPPLEMENTAL INFORMATION

Use this section if you need additional space for answers to questions in Part III.
Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)

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PHOSPHORIC ACID

ADDITIONAL INFORMATION ON RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE
(Part III, Section 5.3)

You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Release (pounds/year)		B. Basis of Estimate (enter code in box provided)	C. % From Stormwater
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
5.3 Discharges to receiving streams or water bodies (Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3. ___ a [] [] []		5.3. ___ b []	5.3. ___ c %
	5.3. ___ a [] [] []		5.3. ___ b []	5.3. ___ c %
	5.3. ___ a [] [] []		5.3. ___ b []	5.3. ___ c %

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS
(Part III, Section 5)

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/year)		B. Basis of Estimate (enter code in box provided)	C. Type of Treatment/Disposal (enter code in box provided)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1. Discharge to POTW (enter location number from Part II, Section 1.)	[] [] []		6.1. ___ b []	
6.2. Other off-site location (enter location number from Part II, Section 2.)	[] [] []		6.2. ___ b []	6.2. ___ c M [] []
6.2. Other off-site location (enter location number from Part II, Section 2.)	[] [] []		6.2. ___ b []	6.2. ___ c M [] []
6.2. Other off-site location (enter location number from Part II, Section 2.)	[] [] []		6.2. ___ b []	6.2. ___ c M [] []

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)

A. General Wastestream (enter code in box provided)	B. Treatment Method (enter code in box provided)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7. N/A a []	7. ___ b [] [] []	7. ___ c []	7. ___ d []	7. ___ e %	7. ___ f [] []
7. ___ a []	7. ___ b [] [] []	7. ___ c []	7. ___ d []	7. ___ e %	7. ___ f [] []
7. ___ a []	7. ___ b [] [] []	7. ___ c []	7. ___ d []	7. ___ e %	7. ___ f [] []
7. ___ a []	7. ___ b [] [] []	7. ___ c []	7. ___ d []	7. ___ e %	7. ___ f [] []
7. ___ a []	7. ___ b [] [] []	7. ___ c []	7. ___ d []	7. ___ e %	7. ___ f [] []
7. ___ a []	7. ___ b [] [] []	7. ___ c []	7. ___ d []	7. ___ e %	7. ___ f [] []
7. ___ a []	7. ___ b [] [] []	7. ___ c []	7. ___ d []	7. ___ e %	7. ___ f [] []
7. ___ a []	7. ___ b [] [] []	7. ___ c []	7. ___ d []	7. ___ e %	7. ___ f [] []



U.S. Environmental Protection Agency

TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM

Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act

EPA FORM
RPART I.
FACILITY
IDENTIFICATION
INFORMATION

(This space for your optional use.)

SULFURIC ACID

Public reporting burden for this collection of information is estimated to vary from 30 to 34 hours per response, with an average of 32 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch (PM-223), US EPA, 401 M St., SW, Washington, D.C. 20460 Attn: TRI Burden and to the Office of Information and Regulatory Affairs, Office of Management and Budget Paperwork Reduction Project (2070-0093), Washington, D.C. 20503.

1. 1.1 Are you claiming the chemical identity on page 3 trade secret? ☐ Yes (Answer question 1.2; Attach substantiation forms.) ☒ No (Do not answer 1.2; Go to question 1.3.) 1.2 If "Yes" in 1.1, is this copy: ☐ Sanitized ☐ Unsanitized 1.3 Reporting Year 19 89

2. CERTIFICATION (Read and sign after completing all sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report.

Name and official title of owner/operator or senior management official

JOSEPH S. MORRILL - RESIDENT MANAGER

Signature

Joseph S. Morrill

Date signed

6-21-90

3. FACILITY IDENTIFICATION

3.1	Facility or Establishment Name GEORGIA-PACIFIC CORPORATION	
	Street Address 2ND PLACE & WAITE STREET	
	City GARY	County LAKE
	State INDIANA	Zip Code 46404
	TRI Facility Identification Number 46404GRGPC2NDPL	

WHERE TO SEND COMPLETED FORMS:

1. EPCRA REPORTING CENTER
P.O. BOX 23779 223779
WASHINGTON, DC 20026-3779
ATTN: TOXIC CHEMICAL RELEASE INVENTORY
2. APPROPRIATE STATE OFFICE (See Instructions in Appendix G)

3.2	This report contains information for (Check only one): a. <input checked="" type="checkbox"/> An entire facility b. <input type="checkbox"/> Part of a facility.					
3.3	Technical Contact KENNETH J. RENSHAW				Telephone Number (include area code) (219) 882-1640	
3.4	Public Contact JOSEPH S. MORRILL				Telephone Number (include area code) (219) 882-1640	
3.5	SIC Code (4 digit) 2621					
3.6	Latitude Degrees Minutes Seconds 91 33 60			Longitude Degrees Minutes Seconds 87 33 60		
3.7	Dun & Bradstreet Number(s) a. 00-393-800				b.	
3.8	EPA Identification Number(s) (RCRA I.D. No.) a. IND003938800				b.	
3.9	NPDES Permit Number(s) a. N/A				b.	
3.10	Receiving Streams or Water Bodies (enter one name per box) a.				b.	
	c.				d.	
	e.				f.	
3.11	Underground Injection Well Code (UIC) Identification Number(s) a. N/A				b.	

4. PARENT COMPANY INFORMATION

4.1	Name of Parent Company GEORGIA-PACIFIC CORPORATION	4.2	Parent Company's Dun & Bradstreet Number 00-902-0777
-----	---	-----	---

(Important: Type or print; read instructions before completing form.)



EPA FORM R
PART II. OFF-SITE LOCATIONS TO WHICH TOXIC
CHEMICALS ARE TRANSFERRED IN WASTES

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1. PUBLICLY OWNED TREATMENT WORKS (POTWs)

1.1 POTW name GARY SANITARY DISTRICT		1.2 POTW name N/A	
Street Address 3600 WEST 3RD AVENUE		Street Address	
City GARY	County LAKE	City	County
State INDIANA	Zip 46406	State	Zip

2. OTHER OFF-SITE LOCATIONS (DO NOT REPORT LOCATIONS TO WHICH WASTES ARE SENT ONLY FOR RECYCLING OR REUSE).

2.1 Off-site location name GARY AIRPORT AUTHORITY		2.2 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address 6131 INDUSTRIAL HIGHWAY		Street Address	
City GARY	County LAKE	City	County
State INDIANA	Zip 46406	State	Zip
Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No	

2.3 Off-site location name N/A		2.4 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No		Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No	
2.5 Off-site location name N/A		2.6 Off-site location name N/A	
EPA Identification Number (RCRA ID. No.)		EPA Identification Number (RCRA ID. No.)	
Street Address		Street Address	
City	County	City	County
State	Zip	State	Zip
Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No		Is location under control of reporting facility or parent company? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Check if additional pages of Part II are attached. How many? _____			

<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> </div> <div style="text-align: center;"> EPA FORM R PART III. CHEMICAL-SPECIFIC INFORMATION </div> </div>	(This space for your optional use.) <div style="text-align: center;"> 1989 SULFURIC ACID </div>
--	--

1. CHEMICAL IDENTITY (Do not complete this section if you complete Section 2.)	
1.1	[Reserved]
1.2	CAS Number (Enter only one number exactly as it appears on the 313 list. Enter NA if reporting a chemical category.) <div style="text-align: center;">7664-93-9</div>
1.3	Chemical or Chemical Category Name (Enter only one name exactly as it appears on the 313 list.) <div style="text-align: center;">SULFURIC ACID</div>
1.4	Generic Chemical Name (Complete only if Part I, Section 1.1 is checked "Yes." Generic name must be structurally descriptive.)

2. MIXTURE COMPONENT IDENTITY (Do not complete this section if you complete Section 1.)	
2.	Generic Chemical Name Provided by Supplier (Limit the name to a maximum of 70 characters (e.g., numbers, letters, spaces, punctuation).)

3. ACTIVITIES AND USES OF THE CHEMICAL AT THE FACILITY (Check all that apply.)			
3.1	Manufacture the chemical:	If produce or import:	
	a. <input type="checkbox"/> Produce	c. <input type="checkbox"/> For on-site use/processing	d. <input type="checkbox"/> For sale/distribution
	b. <input type="checkbox"/> Import	e. <input type="checkbox"/> As a byproduct	f. <input type="checkbox"/> As an impurity
3.2	Process the chemical:	b. <input type="checkbox"/> As a formulation component	c. <input type="checkbox"/> As an article component
	d. <input type="checkbox"/> Repackaging only		
3.3	Otherwise use the chemical:	a. <input type="checkbox"/> As a chemical processing aid	b. <input type="checkbox"/> As a manufacturing aid
		c. <input checked="" type="checkbox"/> Ancillary or other use	

4. MAXIMUM AMOUNT OF THE CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR	
<div style="border: 1px solid black; display: inline-block; padding: 2px;">04</div>	(enter code)

5. RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE					
You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)		A. Total Release (pounds/year)		B. Basis of Estimate	C. % From Stormwater
		A.1 Reporting Ranges	A.2 Enter Estimate	(enter code)	
		0 1-499 500-999			
5.1 Fugitive or non-point air emissions	5.1a	[] [] []	N/A	5.1b <input type="checkbox"/>	
5.2 Stack or point air emissions	5.2a	[] [] []	N/A	5.2b <input type="checkbox"/>	
5.3 Discharges to receiving streams or water bodies	5.3.1 <input type="checkbox"/>	5.3.1a [] [] []	N/A	5.3.1b <input type="checkbox"/>	5.3.1c %
(Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.2 <input type="checkbox"/>	5.3.2a [] [] []	N/A	5.3.2b <input type="checkbox"/>	5.3.2c %
	5.3.3 <input type="checkbox"/>	5.3.3a [] [] []	N/A	5.3.3b <input type="checkbox"/>	5.3.3c %
5.4 Underground injection on-site	5.4a	[] [] []	N/A	5.4b <input type="checkbox"/>	
5.5 Releases to land on-site	5.5.1a	[] [] []	N/A	5.5.1b <input type="checkbox"/>	
5.5.1 Landfill					
5.5.2 Land treatment/application farming	5.5.2a	[] [] []	N/A	5.5.2b <input type="checkbox"/>	
5.5.3 Surface impoundment	5.5.3a	[] [] []	N/A	5.5.3b <input type="checkbox"/>	
5.5.4 Other disposal	5.5.4a	[] [] []	N/A	5.5.4b <input type="checkbox"/>	

[] (Check if additional information is provided on Part IV-Supplemental information.)

(Important: Type or print; read instructions before completing form.)



EPA FORM R

PART III. CHEMICAL-SPECIFIC INFORMATION
(continued)

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6. TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS

You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/year)		B. Basis of Estimate (enter code)	C. Type of Treatment/Disposal (enter code)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1.1 Discharge to POTW (enter location number from Part I, Section 2.) <input type="checkbox"/> 1 <input type="checkbox"/> 1 [] [] []	40	6.1.1b <input type="checkbox"/> 0		
6.2.1 Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/> 1 [] [] []	1	6.2.1b <input type="checkbox"/> 0	6.2.1c <input type="checkbox"/> M <input type="checkbox"/> 7 <input type="checkbox"/> 2	
6.2.2 Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/> [] [] []		6.2.2b <input type="checkbox"/> []	6.2.2c <input type="checkbox"/> M <input type="checkbox"/> []	
6.2.3 Other off-site location (enter location number from Part I, Section 2.) <input type="checkbox"/> 2 <input type="checkbox"/> [] [] []		6.2.3b <input type="checkbox"/> []	6.2.3c <input type="checkbox"/> M <input type="checkbox"/> []	

[] (Check if additional information is provided on Part IV-Supplemental Information.)

7. WASTE TREATMENT METHODS AND EFFICIENCY

[X] Not Applicable (NA) - Check if no on-site treatment is applied to any wastestream containing the chemical or chemical category.

A. General Wastestream (enter code)	B. Treatment Method (enter code)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7.1a <input type="checkbox"/> []	7.1b <input type="checkbox"/> [] [] []	7.1c <input type="checkbox"/> []	7.1d [] []	7.1e %	7.1f [] []
7.2a <input type="checkbox"/> []	7.2b <input type="checkbox"/> [] [] []	7.2c <input type="checkbox"/> []	7.2d [] []	7.2e %	7.2f [] []
7.3a <input type="checkbox"/> []	7.3b <input type="checkbox"/> [] [] []	7.3c <input type="checkbox"/> []	7.3d [] []	7.3e %	7.3f [] []
7.4a <input type="checkbox"/> []	7.4b <input type="checkbox"/> [] [] []	7.4c <input type="checkbox"/> []	7.4d [] []	7.4e %	7.4f [] []
7.5a <input type="checkbox"/> []	7.5b <input type="checkbox"/> [] [] []	7.5c <input type="checkbox"/> []	7.5d [] []	7.5e %	7.5f [] []
7.6a <input type="checkbox"/> []	7.6b <input type="checkbox"/> [] [] []	7.6c <input type="checkbox"/> []	7.6d [] []	7.6e %	7.6f [] []
7.7a <input type="checkbox"/> []	7.7b <input type="checkbox"/> [] [] []	7.7c <input type="checkbox"/> []	7.7d [] []	7.7e %	7.7f [] []
7.8a <input type="checkbox"/> []	7.8b <input type="checkbox"/> [] [] []	7.8c <input type="checkbox"/> []	7.8d [] []	7.8e %	7.8f [] []
7.9a <input type="checkbox"/> []	7.9b <input type="checkbox"/> [] [] []	7.9c <input type="checkbox"/> []	7.9d [] []	7.9e %	7.9f [] []
7.10a <input type="checkbox"/> []	7.10b <input type="checkbox"/> [] [] []	7.10c <input type="checkbox"/> []	7.10d [] []	7.10e %	7.10f [] []

[] (Check if additional information is provided on Part IV-Supplemental Information.)

8. POLLUTION PREVENTION: OPTIONAL INFORMATION ON WASTE MINIMIZATION
(Indicate actions taken to reduce the amount of the chemical being released from the facility. See the instructions for coded items and an explanation of what information to include.)

A. Type of Modification (enter code)	B. Quantity of the Chemical in Wastes Prior to Treatment or Disposal		C. Index	D. Reason for Action (enter code)
<input type="checkbox"/> M	Current reporting year (pounds/year)	Prior year (pounds/year)	Or percent change. (Check (+) or (-))	
			<input type="checkbox"/> + <input type="checkbox"/> - %	<input type="checkbox"/> R

<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <p>EPA FORM R</p> <p>PART IV. SUPPLEMENTAL INFORMATION</p> <p>Use this section if you need additional space for answers to questions in Part III. Number the lines used sequentially from lines in prior sections (e.g., 5.3.4, 6.1.2, 7.11)</p> </div> <div style="text-align: center; flex-grow: 1;"> <p>(This space for your optional use.)</p> <p>1989</p> <p>SULFURIC ACID</p> </div> </div>	
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ADDITIONAL INFORMATION ON RELEASES OF THE CHEMICAL TO THE ENVIRONMENT ON-SITE (Part III, Section 5.3)					
You may report releases of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Release (pounds/year)			B. Basis of Estimate (enter code in box provided)	C. % From Stormwater
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate			
5.3 Discharges to receiving streams or water bodies	5.3.____a [] [] []			5.3.____b []	5.3.____c %
(Enter letter code for stream from Part I Section 3.10 in the box provided.)	5.3.____a [] [] []			5.3.____b []	5.3.____c %
5.3.____	5.3.____a [] [] []			5.3.____b []	5.3.____c %

ADDITIONAL INFORMATION ON TRANSFERS OF THE CHEMICAL IN WASTE TO OFF-SITE LOCATIONS (Part III, Section 6)				
You may report transfers of less than 1,000 pounds by checking ranges under A.1. (Do not use both A.1 and A.2)	A. Total Transfers (pounds/year)		B. Basis of Estimate (enter code in box provided)	C. Type of Treatment/Disposal (enter code in box provided)
	A.1 Reporting Ranges 0 1-499 500-999	A.2 Enter Estimate		
6.1. Discharge to POTW (enter location number from Part I, Section 1.)	[] [] []			6.1.____b []
6.2. Other off-site location (enter location number from Part I, Section 2.)	[] [] []			6.2.____b [] 6.2.____c [M] []
6.2. Other off-site location (enter location number from Part I, Section 2.)	[] [] []			6.2.____b [] 6.2.____c [M] []
6.2. Other off-site location (enter location number from Part I, Section 2.)	[] [] []			6.2.____b [] 6.2.____c [M] []

ADDITIONAL INFORMATION ON WASTE TREATMENT METHODS AND EFFICIENCY (Part III, Section 7)					
A. General Wastestream (enter code in box provided)	B. Treatment Method (enter code in box provided)	C. Range of Influent Concentration (enter code)	D. Sequential Treatment? (check if applicable)	E. Treatment Efficiency Estimate	F. Based on Operating Data? Yes No
7. N/A a []	7.____b [] []	7.____c []	7.____d []	7.____e %	7.____f [] []
7.____a []	7.____b [] []	7.____c []	7.____d []	7.____e %	7.____f [] []
7.____a []	7.____b [] []	7.____c []	7.____d []	7.____e %	7.____f [] []
7.____a []	7.____b [] []	7.____c []	7.____d []	7.____e %	7.____f [] []
7.____a []	7.____b [] []	7.____c []	7.____d []	7.____e %	7.____f [] []
7.____a []	7.____b [] []	7.____c []	7.____d []	7.____e %	7.____f [] []
7.____a []	7.____b [] []	7.____c []	7.____d []	7.____e %	7.____f [] []
7.____a []	7.____b [] []	7.____c []	7.____d []	7.____e %	7.____f [] []

**Tier Two
EMERGENCY
AND
HAZARDOUS
CHEMICAL
INVENTORY**

Specific
Information
by Chemical

Facility Identification

Name Georgia-Pacific Corporation
Street Address 2nd Place & Waite Street
City Gary State IN Zip 46404

SIC Code 2621 Dun & Brad Number 00-393-8800

FOR
OFFICIAL
USE
ONLY

ID # 06140

Date Received

Owner/Operator Name

Name Georgia-Pacific Corp. Phone (219) 882-1640
Mall Address 2nd Place & Waite St., Gary, IN 46404

Emergency Contact

Name K.J. Renshaw Title Technical Director
Phone (219) 882-1640 24 Hr. Phone (219) 882-1640

Name _____ Title _____
Phone () 24 Hr. Phone ()

Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 19 89

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory			Storage Codes and Locations (Non-Confidential)	
		Max. Daily Amount (code)	Avg. Daily Amount (code)	No. of Days On-site (days)	Storage Code	Storage Locations
CAS <u>007664939</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Sulfuric Acid 66 Be'</u> Check all that apply: <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input checked="" type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>03</u>	<u>03</u>	<u>365</u>	<u>A14</u>	<u>0-2 Backside of the mill</u>
CAS <u>007664939</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Sulfuric Acid 50%</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input checked="" type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>03</u>	<u>02</u>	<u>365</u>	<u>E14</u>	<u>G-7 Receiving Warehouse</u>
CAS <u>010043013</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Aluminum Sulfate</u> Check all that apply: <input checked="" type="checkbox"/> Pure <input type="checkbox"/> Mix <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input checked="" type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>03</u>	<u>03</u>	<u>365</u>	<u>C14</u>	<u>B-1 Paper Machine Basement</u>

Add attachment 2.1

Certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Don S. Merrill - Resident Manager

Optional Attachments (Check)

☒ I have attached a site plan

3-02-00

Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY <i>Specific Information by Chemical</i>	Facility Identification Name <u>Georgia-Pacific Corporation</u> Street Address <u>2nd Place & Waite Street</u> City <u>Gary</u> State <u>IN</u> Zip <u>46404</u> SIC Code <u>2621</u> Dun & Brad Number <u>00-393-8800</u> FOR OFFICIAL USE ONLY ID # <u>06140</u> Date Received _____		Owner/Operator Name Name <u>Georgia-Pacific Corp.</u> Phone <u>(219) 882-1640</u> Mail Address <u>P.O. Box 4326, Gary, IN 46404</u> Emergency Contact Name <u>K.J. Renshaw</u> Title <u>Technical Dir.</u> Phone <u>(219) 882-1640</u> 24 Hr. Phone <u>(219) 882-1640</u> Name _____ Title _____ Phone () 24 Hr. Phone ()	
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Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 19 89

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory Max. Daily Amount (code) Avg. Daily Amount (code) No. of Days On-site (days)	Storage Codes and Locations (Non-Confidential) Storage Code Storage Locations
CAS <u>001310732</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Sodium Hydroxide 50%</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<div style="display: flex; justify-content: space-around;"> <u>03</u> <u>03</u> <u>365</u> </div>	<div style="display: flex;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">C14</div> <div><u>B-1 Paper Machine Basement</u></div> </div>
CAS <u>000050000</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Formaldehyde</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input checked="" type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<div style="display: flex; justify-content: space-around;"> <u>03</u> <u>03</u> <u>365</u> </div>	<div style="display: flex;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">C14</div> <div><u>B-1 Paper Machine Basement</u></div> </div>
CAS <u>007664382</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Phosphoric Acid</u> <u>Solvox 261</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<div style="display: flex; justify-content: space-around;"> <u>03</u> <u>02</u> <u>365</u> </div>	<div style="display: flex;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">E14</div> <div><u>G-8 Bird Room</u></div> </div>

Certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on the inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Richard L. Mansueti

3-02-00

Optional Attachments (Check)

☒ I have attached a site plan
☐ I have attached a list of site-related abnormalities

Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY <i>Specific Information by Chemical</i>	Facility Identification		Owner/Operator Name	
	Name <u>Georgia-Pacific Corporation</u>		Name <u>Georgia-Pacific Corp.</u> Phone <u>(219) 882-1640</u>	
	Street Address <u>2nd Place & Waite Street</u>		Mail Address <u>P.O. Box 4326, Gary, IN 46404</u>	
	City <u>Gary</u> State <u>IN</u> Zip <u>46404</u>		Emergency Contact	
SIC Code <u>2621</u> Dun & Brad Number <u>00-393-8800</u>		Name <u>K.J. Renshaw</u> Title <u>Technical Director</u>		
FOR OFFICIAL USE ONLY ID # <u>06140</u>		Phone <u>(219) 882-1640</u> 24 Hr. Phone <u>(219) 882-1640</u>		
Date Received _____		Name _____ Title _____		
_____		Phone () _____ 24 Hr. Phone () _____		

Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 19 89

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory Max. Daily Amount (code) Avg. Daily Amount (code) No. of Days On-site (days)	Storage Codes and Locations (Non-Confidential) Storage Code Storage Locations															
CAS <u>000111762</u> Trade Secret <input type="checkbox"/> Chem. Name <u>2-Butoxy-1-Ethanol</u> <u>Solvox 261</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input checked="" type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<div style="display: flex; justify-content: space-around;"> <u>03</u> <u>02</u> <u>365</u> </div>	<div style="display: flex; align-items: center;"> <table border="1" style="border-collapse: collapse; text-align: center;"> <tr><td>E</td><td>1</td><td>4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table> <div style="margin-left: 10px;"> <u>G-7 Bird Room</u> _____ _____ _____ _____ </div> </div>	E	1	4												
E	1	4																
CAS <u>008012961</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Oil Mist Mineral</u> <u>(Petroleum Distillate)</u> <u>Solvox 615</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input checked="" type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<div style="display: flex; justify-content: space-around;"> <u>03</u> <u>03</u> <u>365</u> </div>	<div style="display: flex; align-items: center;"> <table border="1" style="border-collapse: collapse; text-align: center;"> <tr><td>C</td><td>1</td><td>4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table> <div style="margin-left: 10px;"> <u>G-5 Near Paper Machine</u> _____ _____ _____ _____ </div> </div>	C	1	4												
C	1	4																
CAS <u>008012951</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Solvox 614</u> <u>Hydrocarbon Oils,</u> <u>process blends</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input checked="" type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input checked="" type="checkbox"/> Reactivity <input type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<div style="display: flex; justify-content: space-around;"> <u>03</u> <u>03</u> <u>048</u> </div>	<div style="display: flex; align-items: center;"> <table border="1" style="border-collapse: collapse; text-align: center;"> <tr><td>C</td><td>1</td><td>4</td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </table> <div style="margin-left: 10px;"> <u>G-5 Near Paper Machine</u> _____ _____ _____ _____ </div> </div>	C	1	4												
C	1	4																

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Optional Attachments (Check one)

☒ I have attached a site plan

Tier Two EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific
Information
by Chemical

Facility Identification

Name Georgia-Pacific Corporation
Street Address 2nd Place & Waite Street
City Gary State IN Zip 46404

SIC Code 2621 Dun & Brad Number 00-393-8800

FOR OFFICIAL USE ONLY
ID # 06140
Date Received

Owner/Operator Name

Name Georgia-Pacific Corp. Phone 219, 882-1640
Mail Address P.O. Box 4326, Gary, IN 46404

Emergency Contact

Name K.J. Renshaw Title Technical Director
Phone (219) 882-1640 24 Hr. Phone (219) 882-1640

Name _____ Title _____
Phone () 24 Hr. Phone ()

Important: Read all instructions before completing form

Reporting Period From January 1 to December 31, 19 89

Chemical Description	Physical and Health Hazards (check all that apply)	Inventory Max. Daily Amount (code) Avg. Daily Amount (code) No. of Days On-site (days)	Storage Codes and Locations (Non-Confidential) Storage Code Storage Locations
CAS <u>008012951</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Solvox 1249</u> <u>Hydrocarbon Oils</u> <u>process blends</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input checked="" type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>03</u> <u>03</u> <u>072</u>	<u>C14</u> <u>G-5 Near Paper Machine</u>
CAS <u>008012951</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Solvox 1230</u> <u>Hydrocarbon Oils</u> <u>process blends</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input checked="" type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>03</u> <u>03</u> <u>060</u>	<u>C14</u> <u>G-5 Near Paper Machine</u>
CAS <u>- - - - -</u> Trade Secret <input type="checkbox"/> Chem. Name <u>Saponified Tall</u> <u>Oil Resin Acid in</u> <u>Water Solution</u> Check all that apply: <input type="checkbox"/> Pure <input checked="" type="checkbox"/> Mix <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid <input type="checkbox"/> Gas	<input type="checkbox"/> Fire <input type="checkbox"/> Sudden Release of Pressure <input type="checkbox"/> Reactivity <input checked="" type="checkbox"/> Immediate (acute) <input checked="" type="checkbox"/> Delayed (chronic)	<u>03</u> <u>03</u> <u>365</u>	<u>014</u> <u>G-4 K.D. Storage Room</u>

Certification (Read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

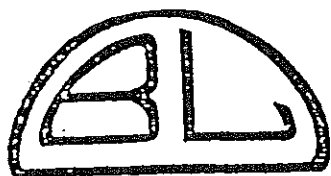
Optional Attachments (Check one)

☒ I have attached a site plan

<u>DESCRIPTION</u>	<u>APPRX. AVERAGE DAILY INVENTORY</u>
WET ALUM	2100 GALLONS
DRY ALUM	50 BAGS
SOLVOX 1230 (BULK)	2500 GALLONS
SOLVOX 1230 (DRUMS)	8
SOLVOX 615 (DRUMS)	4
SOLVOX 615 (BULK)	2000 GALLONS
NOVAFLO 50	12 TOTE BINS
NALCO 7620WB	4 DRUMS
AMRES 2552	3000 GALLONS
SULFURIC ACID 50%	16 DRUMS
SULFURIC ACID 66 Be	1600 GALLONS
SOLVOX 870	3 DRUMS
SOLVOX 906	20 DRUMS
SOLVOX 718	4 DRUMS
MERIT 407X	4 DRUMS
SOLVOX L530	4 DRUMS
MERIT SAFETY SOLVENT	4 DRUMS

Attachment 2.6

SALT	50 BAGS
AMERPAC 8703	150 GALLONS
ADVANTAGE 101	200 GALLONS
NALCO 623NC	3 DRUMS
CAUSTIC SODA, DRY	4 DRUMS
CAUSTIC SODA, LIQUID	1600 GALLONS
SOLVOX 165	1 DRUM
SOLVOX 174	19 DRUMS
SOLVOX 261	12 DRUMS



PRODUCT DATA

April 15, 1974

Bulletin No. A33

BUSAN® 40

(Patents issued or pending in the U.S.A. and other countries)

FOR MICROORGANISM CONTROL IN PULP AND PAPER MILLS

Busan 40 is a new organosulfur product that is effective in the control of bacterial and fungal slime in pulp and paper mill systems. It is highly effective against microorganisms at pH values below 7, and, in contrast to some other microbicides, it also has a good degree of activity in the alkaline pH range. Thus, Busan 40 is useful alone or in combination with other Busan microbicides to obtain savings in slime control costs. In slime control applications, Busan 40 is compatible with the full range of Busan microbicides.

Busan 40 is composed of substances that have been allowed for use in the manufacture of paper and paperboard under U.S. Food and Drug Administration Regulation 121.2505.

PRODUCT CHARACTERISTICS

Busan 40 is a liquid packed in 240-kg. (530-lb.) net weight, lined, nonreturnable steel drums with bungs. Penton, Teflon, polyethylene, polypropylene, molded nylon, and stainless steel are all satisfactory for storing and handling the product, but prolonged contact of concentrated Busan 40 with copper and copper alloys should be avoided. Busan 40 is completely soluble in water. The composition and some of the physical properties of Busan 40 are as follows:

Active ingredient:

Potassium *N*-hydroxymethyl-*N*-methyldithiocarbamate 40 percent

Inert ingredients 60 percent

Density at 25° C. (77° F.) 1.18 g. per ml.

Approximate weight per U.S. gallon 9.8 lb.

Approximate volume per kilogram 850 ml.

Approximate volume per pound 385 ml.

Flashpoint by Tagliabue open-cup method Above 100° C. (212° F.)

pH of 100 parts per million in distilled water 8-10

Busan 40 is moderately toxic by ingestion in single doses and is irritating to the skin and eyes. Workmen handling the product should wear rubber gloves and goggles and should observe other precautions shown on the label.

METHODS OF APPLICATION

Busan 40 can be fed into the system directly from the shipping containers by use of chemical-metering pumps. It can also be dispensed in suitable measuring containers or by means of drip-feed devices.

Buckman Laboratories, Inc.

BUCKMAN LABORATORIES INTERNATIONAL, INC.

MEMPHIS, TENNESSEE 38108, U.S.A.

BUCKMAN LABORATORIES PTY. LTD.
SYDNEY, AUSTRALIA

BUCKMAN LABORATORIES, S.A.
GHENT, BELGIUM

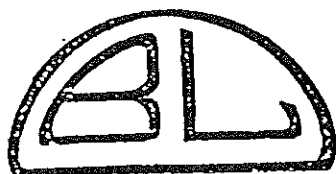
BUCKMAN LABORATORIOS, LTDA.
CAMPINAS, BRAZIL

BUCKMAN LABORATORIES OF CANADA, LTD.
MONTREAL, CANADA

BUCKMAN LABORATORIES, LTD.
TOKYO, JAPAN

BUCKMAN LABORATORIES, S. A. DE C. V.
MEXICO, D. F., MEXICO

BUCKMAN LABORATORIES (PTY) LTD
DURBAN, SOUTH AFRICA



PRODUCT DATA

April 15, 1975

Bulletin No. A41

BUBOND® 65

(Patents issued or pending in the U.S.A. and other countries)

HIGH MOLECULAR WEIGHT CATIONIC POLYELECTROLYTE

Bubond 65 is an aqueous solution of a high molecular weight cationic polyelectrolyte. It is used in the manufacture of paper and paperboard to improve particle retention, formation, and drainage and to increase the dry strength of the sheet. It is employed in the treatment of water and effluents as a flocculant, flocculating aid, and sludge dewatering aid. In petroleum secondary recovery, it is used to aid in the separation of oil from the various waters used in waterflooding operations.

PRODUCT CHARACTERISTICS

Bubond 65 is a liquid containing a minimum of 25 percent polymer solids. It is packed in 220-kg. (485-lb.) net weight, lined, nonreturnable steel drums with bungs. It is completely water soluble, dilutes readily, and can be handled and stored in stainless steel, glass, and most plastic materials of construction. Some of the physical properties of Bubond 65 are as follows:

Density at 25° C. (77° F.)	1.10 g. per ml.
Approximate weight per U.S. gallon	9.2 lb.
Approximate volume per kilogram	910 ml.
Approximate volume per pound	410 ml.
Flashpoint by Tagliabue open-cup method	Above 99° C. (210° F.)
pH of 100 parts per million in distilled water	4-5

Bubond 65 has a relatively low toxicity to warmblooded animals. However, as a general precaution, workmen handling the product should avoid contact with the skin and eyes and should avoid contamination of food.

APPLICATIONS

Bubond 65 dissolves easily and completely in water, and there is no need for special dissolving equipment or for screens to remove undissolved solids or gel particles. Dilute solutions of any lower concentration can be prepared merely by adding the polyelectrolyte to water and stirring. In some cases, Bubond 65 can be fed into the system directly from the shipping containers, for example, by means of chemical-metering pumps, and dilution can take place in the system itself. However, Bubond 65 is highly cationic and is adsorbed quickly by fibrous and nonfibrous particles, especially fine particles. Therefore to ensure uniform distribution in papermaking stocks, it is recommended that Bubond 65 be diluted with water before it is fed to the system. The dilution should be to at least 1 percent polymer solids, or preferably between 0.1 and 0.5 percent solids. The dilution can be done batchwise in an agitated mix tank. However, it can also be done continuously by use of a chemical-metering pump to inject the product into a waterline equipped with an inline mixing device.

Buckman Laboratories, Inc.

BUCKMAN LABORATORIES INTERNATIONAL, INC.

MEMPHIS, TENNESSEE 38108, U.S.A.

BUCKMAN LABORATORIES PTY. LTD.
SYDNEY, AUSTRALIA

BUCKMAN LABORATORIES, S. A.
GHENT, BELGIUM

BUCKMAN LABORATORIOS, LTDA
CAMPINAS, BRAZIL

BUCKMAN LABORATORIES OF CANADA, L.
MONTREAL, CANADA

BUCKMAN LABORATORIES, LTD
TOKYO, JAPAN

BUCKMAN LABORATORIES, S. A. DE C. V.
MEXICO, D. F. MEXICO

BUCKMAN LABORATORIES (PTY) LTD
DURBAN, SOUTH AFRICA

 CREATIVITY FOR OUR CUSTOMERS 



MATERIAL SAFETY DATA SHEET

(Approved by U.S. Department of Labor as "Essentially Similar" to Form OSHA-20)

MSDS 296
DATE 5/15/79

PAGE 1 of 2

I. PRODUCT IDENTIFICATION

CHEMICAL NAME NA AND SYNONYMS	REGULAR TELEPHONE NO. 302-575-5000 CHEMTREC TELEPHONE NO. 800-424-9300
CHEMICAL NA FAMILY	CAS NO.
FORMULA NA	MOLECULAR WEIGHT
TRADE NAME AND SYNONYMS	HERCULES [®] DEFOAMERS: 4, 5, 6, and 7.

II. HAZARDOUS INGREDIENTS

MATERIAL	%	TLV-TWA VALUES ADOPTED BY ACGIH
NOTE: As Hercules interprets the U. S. Occupational Safety and Health Act of 1970, these products should not be considered hazardous materials.		

III. PHYSICAL DATA

BOILING POINT, 760 mm Hg	NA	MELTING POINT	54°C (130°F) Typical
VAPOR PRESSURE @	NA	SPECIFIC GRAVITY (H ₂ O=1)	0.96 Typical
VAPOR DENSITY (AIR=1)	NA	PERCENT VOLATILE BY VOLUME (%)	Unknown
SOLUBILITY IN WATER, Negligible in cold water % BY WEIGHT @ will disperse in hot water.		EVAPORATION RATE (BUTYL ACETATE=1)	< 1
APPEARANCE AND ODOR: Brown 2 1/2 lb. bricks; soapy odor.		pH of a 0.5% water dispersion	7.2

IV. FIRE AND EXPLOSION HAZARD DATA

FLASH POINT > 204°C (400°F) (TEST METHOD)	AUTOIGNITION TEMPERATURE	Unknown
FLAMMABLE LIMITS IN AIR PERCENT BY VOLUME	LOWER NA	UPPER NA
EXTINGUISHING MEDIA: Foam, dry chemical, CO ₂ , water spray or fog.		
SPECIAL FIRE-FIGHTING PROCEDURES: None		
UNUSUAL FIRE AND EXPLOSION HAZARDS: None		
NOTES: NA = NOT APPLICABLE		

cannot anticipate all conditions under which this information and our products, or the products of other manufacturers in combination with our products, may be used. We accept no responsibility for results obtained by the application of this information or the safety and suitability of our products, either alone or in combination with other products. Users are advised to make their own tests to determine the safety and suitability of each such product or product combination for their own purposes. Unless otherwise agreed in writing, we sell the products without warranty, and buyers and users assume all responsibility and liability for loss or damage arising from the handling and use of our products, whether used alone or in combination with other products.

HERCULES INCORPORATED • WILMINGTON, DELAWARE 19899

THRESHOLD LIMIT VALUE: Not established.

EFFECTS OF OVEREXPOSURE: None known.

EMERGENCY AND FIRST AID PROCEDURES: None required.

VI. REACTIVITY DATA

STABILITY	CONDITIONS TO AVOID: None
UNSTABLE	
STABLE	<input checked="" type="checkbox"/>

INCOMPATIBILITY (MATERIALS TO AVOID): None

HAZARDOUS DECOMPOSITION PRODUCTS: CO, CO₂

HAZARDOUS	MAY OCCUR	CONDITIONS TO AVOID: None
POLYMERIZATION	WILL NOT OCCUR <input checked="" type="checkbox"/>	

VII. SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED: If material is not contaminated, scoop into clean containers for use. If contaminated, scoop into containers for disposal.

WASTE DISPOSAL METHOD: Landfill in accordance with local, state and Federal regulations.

VIII. SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE) None required.

VENTILATION	LOCAL EXHAUST	-	SPECIAL	-
	MECHANICAL (GENERAL)	-	OTHER	-

PROTECTIVE GLOVES: Rubber

EYE PROTECTION: Splash goggles

OTHER PROTECTIVE EQUIPMENT: -

IX. SPECIAL PRECAUTIONS

PRECAUTIONARY LABELING: None

OTHER HANDLING AND STORAGE CONDITIONS: Store below 49°C (120°F) to avoid melting of bricks. Recommended storage temperature 4-32°C (40-90°F). Not damaged by freezing.



Drew Chemical Corporation
One Drew Chemical Plaza, Boonton, New Jersey 07005

Material Safety Data Sheet

SECTION I	
PRODUCT NAME Drewfax R-122	EMERGENCY TELEPHONE NO. (201) 263-7600
CHEMICAL DESCRIPTION Blend mineral oils, surfactants and fatty acids	
USE Release Agent	

SECTION II COMPOSITION INFORMATION			
COMPONENT		COMPONENT	

SECTION III PHYSICAL DATA	
SPECIFIC GRAVITY (H ₂ O=1): 0.85	MOLECULAR WT.: N/A
BOILING POINT: >400° F	pH/CONCENTRATION: N/A
MELTING POINT: N/A	FLASH POINT (METHOD): >370° F PM
SOLUBILITY IN WATER: Emulsifiable	FREEZING POINT: <32° F
APPEARANCE AND ODOR: Clear to slightly hazy yellow liquid; bland odor	

SECTION IV FIRE AND EXPLOSION HAZARD DATA	
EXTINGUISHING MEDIA	CO₂, dry chemical
SPECIAL FIRE FIGHTING PROCEDURES	Treat as Class "B" oil fire
UNUSUAL FIRE AND EXPLOSION HAZARDS	None

Specialty Chemical Division
Drew Chemical Corporation
701 Jefferson Rd., Parsippany, N.J. 07054
Subsidiary of United States Filter Corporation

DATA SHEET



Worldwide Service

DREWFAX R-122 YANKEE DRYER RELEASE AGENT

GENERAL

Drewfax R-122 has been designed as an effective lubricant for the easy release of dry creped paper from Yankee Dryers, thereby increasing the life of creping doctor blades.

PROPERTIES

Type	Non-ionic
Composition	A blend of fatty acid derivatives and surface active compounds
Appearance	Clear amber liquid
Cloud Point	0°C
pH of 1% Emulsion	5.0 - 6.0
Pounds/gallon	7.2
Packaging	55 gallon steel drums, net weight approximately 390 pounds

APPLICATIONS

Drewfax R-122 may be added batchwise to stock in beaters, pulpers, or chests. It may also be added continuously to the stuff box or at the white water feed to the suction of the fan pump.

FDA STATUS

Drewfax R-122 complies with Title 21-Code of Federal Regulations, Section 121.2519 of the Food Additives regulation and may be safely used under conditions specified in the regulation.

NOTE: Buyer assumes all risk and liability for personal injury or damages, caused by or resulting from any use, handling or storage of this Product in any manner not in strict accordance with the instructions

prescribed herein. Drew Chemical Corporation makes no warranty of fitness for use or otherwise, expressed or implied, concerning any use of the Product other than as prescribed in the instructions herein.

No statement in this bulletin is intended or should be construed as a recommendation to infringe any existing patent.

165# - July

Drew Chemical Corporation

DREWFAX R-122

Information Furnished By: *R. W. Stangs*

R. W. Stangs

Title: Group Leader

Customer Services

Date: July 15, 1980

"The information recommendations contained herein are based upon data believed to be correct. However, no guarantee or warranty of any kind, expressed or implied, is made with respect to the information contained herein. Employers should use this information only as a supplement to other information gathered by them and must make independent determinations of suitability and completeness of information from all sources to assure proper use of these materials and the safety and health of employees."

N/A = Not Applicable

S
9L

Drew Chemical Corporation

DREWFAX R-122

SECTION V HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE

Potential Irritant: Prolonged or repeated contact may cause irritation.

EMERGENCY AND FIRST AID PROCEDURES

Skin: Wash skin with soap and water

Eyes: Flush with plenty of water. Consult a physician.

SECTION VI REACTIVITY DATA

STABILITY	UNSTABLE	CONDITIONS TO AVOID
	STABLE	

	X	None
--	---	------

INCOMPATIBILITY (Materials to avoid) Strong oxidizing chemicals

HAZARDOUS DECOMPOSITION PRODUCTS
Carbon monoxide or other asphyxiants due to incomplete combustion

HAZARDOUS POLYMERIZATION	MAY OCCUR	CONDITIONS TO AVOID
	WILL NOT OCCUR	

	X	None
--	---	------

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Normal oil spill procedures. Product should be absorbed on an oil absorbent drier.

WASTE DISPOSAL METHOD

Normal oil disposal procedures conforming to local, state and federal regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION

Wear protective gloves and goggles while handling.

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Wash thoroughly after handling.

OTHER PRECAUTIONS

POTENTIALLY IRRITATING LIQUID



Drew Chemical Corporation
One Drew Chemical Plaza, Boonton, New Jersey 07005

Material Safety Data Sheet

PRODUCT NAME <i>Amugel 100</i>		SECTION I
Defoamer SPD 12-592		EMERGENCY TELEPHONE NO. 201-263-7600
CHEMICAL DESCRIPTION Water dispersion of defoaming agents.		
USE Defoamer for paper machines, screen rooms, effluent.		

SECTION II COMPOSITION INFORMATION			
COMPONENT		COMPONENT	

SECTION III PHYSICAL DATA	
SPECIFIC GRAVITY (H ₂ O=1):	0.96
BOILING POINT:	100°C
MELTING POINT:	
SOLUBILITY IN WATER:	Infinitely dispersible
APPEARANCE AND ODOR:	White liquid, tallow odor
MOLECULAR WT.:	
pH/CONCENTRATION:	
FLASH POINT (METHOD):	
FREEZING POINT:	-5°C

SECTION IV FIRE AND EXPLOSION HAZARD DATA	
EXTINGUISHING MEDIA	
SPECIAL FIRE FIGHTING PROCEDURES	None
UNUSUAL FIRE AND EXPLOSION HAZARDS	None

Drew Chemical Corporation

SPD 12-592

Information Furnished By:

M. N. Yudenfreund
M. N. Yudenfreund

Title: Project Manager

Surface Chemistry

Date: September 4, 1979

"Note: This data is furnished gratuitously at your request independent of any sale of the product, only for your investigation and independent verification. While the information is believed to be correct, Drew Chemical Corporation makes no representation as to the accuracy of the information contained herein. Drew Chemical Corporation does not accept responsibility to correct data herein if Drew Chemical Corporation acquires additional information nor does Drew Chemical Corporation accept responsibility to furnish revised information in the event Drew's formula is changed. Drew Chemical Corporation shall in no event be responsible for any damages of whatsoever nature directly or indirectly resulting from the publication or use of or reliance upon data contained herein. No warranty, either express or implied of merchantability or fitness or of any nature with respect to the product or to the data herein is made hereunder. Statements or suggestions concerning possible use of this product or to the data herein is made hereunder. Statements or suggestions concerning possible use of this product are made without representation or warranty that any such use is free of patent infringement and are not recommendations to infringe any patent."

N/A = Not Applicable

SECTION V HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE
No known effects.

EMERGENCY AND FIRST AID PROCEDURES

EYES: Wash for 15 minutes with pure water. See a physician at once.
SKIN: Wash off with soap and water.

SECTION VI REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	
INCOMPATIBILITY (Materials to avoid)			
HAZARDOUS DECOMPOSITION PRODUCTS None			
HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Wash spill away with water.

WASTE DISPOSAL METHOD

Dispose of in accordance with federal, state and local regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION

Safety glasses or goggles
Rubber gloves

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING
Keep from freezing.

OTHER PRECAUTIONS
None

Sale Oil

Typical Physical and Chemical Properties

Gravity: °API	21.5
Viscosity, SUV: Sec.	200
100 F	43.6
210 F	
Flash, OC: F	320
Fire, OC: F	350
Pour: F	-20
Color, ASTM D 1500	4.0
Sulfur: %	0.69
Copper Strip Test 212 F, 3 Hr.	1
Corrosion Test (x) 77 F and 100 F, 168 Hr.	passes
Neutralization No. ASTM D 974 Total Acid No.	0.53
pH Value (x)	8.8
Emulsion Test (x) 1 Part Oil; 9 Parts Synthetic Hard Water	nil trace
Froth, 15 Min.: ML.	
Separated Oil, 72 Hr.: %	
1 Part Oil; 9 Parts Synthetic Hard Water; 10 Parts Methyl Alcohol	
Froth, 15 Min.: ML.	nil
Separated Oil, 72 Hr.: %	1.8

(x) Method described in the latest issue of MIL-C-4339 Specification

SP-10481 DM 10/71



Gulf Oil Company-U.S.
Gulf Building
Houston, Texas 77002



CHEMICALS COMPANY

PRODUCT SAFETY
DATA SHEET**A. GENERAL INFORMATION**

TRADE NAME (COMMON NAME OR SYNONYM)

Liquid Alum

☒ C.A.S. NO. ☐ ALLIED PRODUCT CODE #
10043-01-3

CHEMICAL NAME

Aluminum Sulfate, aqueous solution

FORMULA

48.5% $\text{Al}_2(\text{SO}_4)_3 \cdot 14\text{H}_2\text{O}$ in water

MOLECULAR WEIGHT

594 (approx.) for

 $\text{Al}_2(\text{SO}_4)_3 \cdot 14\text{H}_2\text{O}$

COMPANY/PLANT ADDRESS (No., STREET, CITY, STATE AND ZIP CODE)

Chemicals Company

P.O. Box 1139R

Morristown, N.J. 07960

CONTACT

Director - Technical Service

PHONE NUMBER

(315) 487-4990

ISSUED DATE

June 12, 1980

REVISED DATE

B. FIRST-AID MEASURES**Skin:** Wash with plenty of water.**Eyes:** Flush promptly with plenty of water for at least 15 minutes and get medical attention.**Ingestion:** Dilute by drinking large quantity of water - then induce vomiting.

Get medical attention for irritation, ingestion or discomfort from mist inhalation.

EMERGENCY PHONE NUMBER
(201) 455-2000**C. HAZARDS INFORMATION****FIRE AND EXPLOSION**

FLASH POINT

Not Flammable

°C

AUTO IGNITION
TEMPERATURE

NA - Not Applicable

°C

FLAMMABLE LIMITS IN AIR (% BY VOL.)

LOWER NA

UPPER NA

☐ OPEN CUP ☐ CLOSED CUP

UNUSUAL FIRE AND EXPLOSION HAZARDS

Can evolve toxic SO_3 gas (SO_2 possible also) when exposed to high temperatures (above 760°C [1400°F]).**HEALTH****INHALATION**

Inhalation of alum mist may irritate nose, throat, and lungs.

INGESTION

Although low in toxicity, ingestion can be harmful - consult a physician. May irritate mouth, esophagus, stomach, etc.

SKIN

May cause skin irritation from prolonged contact.

EYES

May irritate or burn eyes.

PERMISSIBLE CONCENTRATION: AIR
(SEE SECTION J)

No TLV established

BIOLOGICAL

UNUSUAL CHRONIC TOXICITY

D. PRECAUTIONS/PROCEDURES**VENTILATION**

Sufficient to eliminate mists.

NORMAL HANDLING

Take precautions to prevent splashing liquid alum which may often be hot.

STORAGE

Store at 45°F (7°C) or above to avoid crystallization.

PRECAUTIONARY LABEL ☐ ATTACHED ☒ NOT ATTACHED

Label warning statement(s): "Warning! Liquid may be irritating to the eyes and skin. Avoid contact."

SPILL OR LEAK

Dilute small spills or leaks cautiously with plenty of water.

Neutralize residue with alkali such as soda ash, lime or limestone.

Adequate ventilation is required for soda ash or limestone due to release of CO₂ gas. (See Section I for disposal methods.)

FIRE EXTINGUISHING AGENTS RECOMMENDED

NA

SPECIAL FIRE FIGHTING PRECAUTIONS

As sulfur oxides may be present at high temperatures, respiratory protection approved by NIOSH may be necessary.

FIRE EXTINGUISHING AGENTS TO AVOID

NA

SPECIAL PRECAUTIONS/PROCEDURES**E. PERSONAL PROTECTIVE EQUIPMENT****RESPIRATORY PROTECTION**

Where required, use a NIOSH - approved respirator for mists.

EYES AND FACE

As a minimum, wear hard hat and chemical safety goggles.
Do not wear contact lenses.

HANDS, ARMS, AND BODY

As a minimum, wear long-sleeve shirt and trousers, boots and impervious apron and gloves for routine product use.

OTHER CLOTHING AND EQUIPMENT

MATERIAL IS (AT NORMAL CONDITIONS);		APPEARANCE AND ODOR	
<input checked="" type="checkbox"/> LIQUID <input type="checkbox"/> SOLID <input type="checkbox"/> GAS <input type="checkbox"/> _____		Clear, light green or amber liquid with a negligible odor.	
BOILING POINT	101 °C	SPECIFIC GRAVITY (H ₂ O = 1)	VAPOR DENSITY (AIR = 1)
MELTING POINT	-16 °C	1.335	NA
SOLUBILITY IN WATER (% by weight)	complete	pH	VAPOR PRESSURE (mm Hg at 20° C)
		1% solution; pH = 3.5 (approx.)	NA
EVAPORATION RATE (Butyl Acetate = 1)	Less than 1	% VOLATILES BY VOLUME (At 20° C)	
		NA	

STABILITY <input type="checkbox"/> UNSTABLE <input checked="" type="checkbox"/> STABLE	CONDITIONS TO AVOID High Temperatures
INCOMPATIBILITY (MATERIALS TO AVOID) Avoid contact with alkalis. Corrosive to aluminum, steel, copper, zinc and many other metals.	
HAZARDOUS DECOMPOSITION PRODUCTS Can evolve SO ₃ gas (SO ₂ gas possible also) when exposed to high temperatures (above 760°C [1400°F]).	
HAZARDOUS POLYMERIZATION <input type="checkbox"/> MAY OCCUR <input checked="" type="checkbox"/> WILL NOT OCCUR	CONDITIONS TO AVOID

[illegible]

J. ENVIRONMENTAL

DEGRADABILITY

OCTANOL/WATER PARTITION COEFFICIENT

WASTE DISPOSAL METHODS*

Neutralize with alkali, then flush to sewer with plenty of water if permitted by applicable disposal regulations. Neutralized waste may have to be disposed of by an approved contractor. When using carbonates for neutralization, adequate precautions should be taken to minimize hazards and pressure build-up from CO₂ gas evolution.

*DISPOSER MUST COMPLY WITH FEDERAL, STATE AND LOCAL DISPOSAL OR DISCHARGE LAWS.

J. REFERENCES**PERMISSIBLE CONCENTRATION REFERENCES****REGULATORY STANDARDS**

DOT Classification: Air Shipments - ORM-B; others - ORM-E (49 CFR).
Designated a hazardous substance for spills by EPA (49 CFR, Parts 116-117).

GENERAL**K. ADDITIONAL INFORMATION**

This product is not for food or drug use.

THIS PRODUCT SAFETY DATA SHEET IS OFFERED SOLELY FOR YOUR INFORMATION, CONSIDERATION AND INVESTIGATION.

ALLIED CHEMICAL PROVIDES NO WARRANTIES, EITHER EXPRESS OR IMPLIED, AND ASSUMES NO RESPONSIBILITY FOR THE ACCURACY OR COMPLETENESS OF THE DATA CONTAINED HEREIN.

MATERIAL SAFETY DATA SHEET

Attachment

A

I PRODUCT IDENTIFICATION

MANUFACTURER'S NAME Solvox Mfg. Company

REGULAR TELEPHONE NO. 1-414-774-5664
EMERGENCY TELEPHONE NO.

ADDRESS 11725 W. Fairview Ave. Milwaukee, Wisconsin 53226

TRADE NAME Solvox Special #254

SYNONYMS

SHIPPING NAME

DOT:

IATA:

II HAZARDOUS INGREDIENTS²

MATERIAL OR COMPONENT	CAS NO.	%	HAZARD DATA
2 propanol		9	
Acidic Material (irritant)		10	

III PHYSICAL DATA

BOILING POINT, 760 MM HG		MELTING POINT	
SPECIFIC GRAVITY (H ₂ O = 1)	1.135 @ 25°C	VAPOR PRESSURE	
VAPOR DENSITY (AIR = 1)		SOLUBILITY IN H ₂ O % BY WT	Complete
% VOLATILES BY VOL.		EVAPORATION RATE (BUTYL ACETATE = 1)	
APPEARANCE AND ODOR	Pale yellow, transparent liquid with mild odor	Ph (AS IS) 1.20 Ph (1% SOLN.) 2.10	

IV FIRE AND EXPLOSION DATA

FLASH POINT (TEST METHOD)	200°F (COC)	AUTOIGNITION TEMPERATURE	
FLAMMABLE LIMITS IN AIR, % BY VOL.	LOWER	UPPER	
EXTINGUISHING MEDIA	CO ₂ Foam, dry chemical		
SPECIAL FIRE FIGHTING PROCEDURES	None		
UNUSUAL FIRE AND EXPLOSION HAZARD	None		

Handwritten signature and date: 11/2/80

V. HEALTH HAZARD INFORMATION

HEALTH HAZARD DATA	HAZARD CLASSIFICATION	HAZARD TEST CLASSIFICATION	SOURCE
WAYS OF EXPOSURE INHALATION	Strong sensitizer	TLV = 150 ppm	Solvox Testing Dept.
SKIN CONTACT	Strong sensitizer	Human patch test	"
SKIN ABSORPTION	Moderately toxic	Application to intact & abraded rabbit (6) skin	"
EYE CONTACT	Severe irritant	Application to eye of 6 albino rabbits.	"
INGESTION	Moderate single dose oral toxicity.	Oral LD ₅₀ rats = 3 gm/kg	"

EFFECTS OF OVEREXPOSURE

ACUTE OVEREXPOSURE Irritation

CHRONIC OVEREXPOSURE Irritation

EMERGENCY AND FIRST AID PROCEDURES

EYES: Flush with lukewarm water 15 mins, and see physician immediately.

SKIN: Wash with soap and water.

INHALATION: Remove subject from immediate area to fresh air.

INGESTION: Administer milk of magnesia, lime water, or soapsuds, followed by milk or eggs. DO NOT INDUCE VOMITING. See physician immediately.

NOTES TO PHYSICIAN

only
14/10/10

VI REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY

Alkaline materials.

COMPATIBILITY

Halogenated Hydrocarbons and inorganic nitrates.

HAZARDOUS DECOMPOSITION PRODUCTS

NA

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION

NA

VII DISPOSAL, SPILL OR LEAK PROCEDURES

AQUATIC TOXICITY (E.G. 96 HR. TLM):

WASTE DISPOSAL METHOD

Neutralize and sewer with copious amounts of water.

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED

Ventilate immediate area, wear protective clothing (goggles, rubber gloves), neutralize and sewer with copious amounts of water.

NEUTRALIZING CHEMICALS

Aqueous solutions of soda ash, lime water, or dilute liquid sodium hydroxide.

VIII SPECIAL PROTECTION INFORMATION

VENTILATION REQUIREMENTS

Local exhaust

SPECIFIC PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY (SPECIFY IN DETAIL)

EYE

Goggles.

GLOVES

Rubber.

OTHER CLOTHING AND EQUIPMENT

Eye bath and safety shower.

#3 of 4 pages
1.1 & 1.2 not in

MATERIAL SAFETY DATA SHEET

I PRODUCT IDENTIFICATION

MANUFACTURER'S NAME	SOLVOX MFG. COMPANY	REGULAR TELEPHONE NO.	1-414-774-5664
ADDRESS		EMERGENCY TELEPHONE NO.	
11725 W. FAIRVIEW AVENUE, MILWAUKEE, WISCONSIN 53226			
TRADE NAME SOLVOX SPECIAL F.P.			
SYNONYMS			
SHIPPING NAME	DOT: FLAMMABLE SOLID		
	IATA:		

II HAZARDOUS INGREDIENTS²

MATERIAL OR COMPONENT	CAS NO.	%	HAZARD DATA
SODIUM DITHIONITE			

III PHYSICAL DATA

BOILING POINT, 760 MM HG	MELTING POINT
SPECIFIC GRAVITY (H ₂ O = 1)	VAPOR PRESSURE
VAPOR DENSITY (AIR = 1)	SOLUBILITY IN H ₂ O % BY WT 25%
% VOLATILES BY VOL.	EVAPORATION RATE (BUTYL ACETATE = 1)
APPEARANCE AND ODOR	PH (AS IS) 7.00 PH (1% SOLN.)
WHITE CRYSTAL, SLIGHT ODOR OF SO ₂	

IV FIRE AND EXPLOSION DATA

FLASH POINT (TEST METHOD)	NONE	AUTOIGNITION TEMPERATURE	
FLAMMABLE LIMITS IN AIR, % BY VOL.	LOWER	UPPER	
EXTINGUISHING MEDIA	DELUGE WITH WATER		
SPECIAL FIRE FIGHTING PROCEDURES	BURNING/SMOLDERING F.P. IN A CONTAINER SHOULD BE SPREAD OUT IF POSSIBLE BEFORE ADDING WATER. GAS MASKS WITH ACID CANNISTER FOR SO ₂ SHOULD BE WORN		
UNUSUAL FIRE AND EXPLOSION HAZARD	SMALL AMOUNTS OF WATER/CONTACT WITH A HIGHLY HUMID ATMOSPHERE IN PRESENCE OF AIR CAN CAUSE FIRE/CREATE TEMP. SIGNIFICANT TO IGNITE NEARBY COMBUSTIBLE MATERIALS.		

VI REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY

MOISTURE AND EXCESS HEAT (ABOUT 120° F)

INCOMPATIBILITY

ALL OXIDIZING AND ACIDIC MATERIALS

HAZARDOUS DECOMPOSITION PRODUCTS

SULFUR DIOXIDE

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION

VII DISPOSAL, SPILL OR LEAK PROCEDURES

AQUATIC TOXICITY (E.G. 96 HR. TLM):

WASTE DISPOSAL METHOD

FLUSH DOWN CHEMICAL SEWER WITH COPIOUS AMOUNTS OF WATER

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED

SWEEP UP ALL SPILLAGE OF SOLVOX SPECIAL F.P. AROUND STORAGE/APPLICATION AREA IMMEDIATELY.

NEUTRALIZING CHEMICALS

VIII SPECIAL PROTECTION INFORMATION

VENTILATION REQUIREMENTS

EXHAUST FAN

SPECIFIC PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY (SPECIFY IN DETAIL)

DUST MASK DURING HANDLING

EYE

CHEMICAL WORKERS GOGGLES

GLOVES

RUBBER

OTHER CLOTHING AND EQUIPMENT

EYE BATH AND SAFETY SHOWER

cond. under this sheet.

HEALTH HAZARD INFORMATION

HEALTH HAZARD DATA	HAZARD CLASSIFICATION	BASIS FOR CLASSIFICATION	SOURCE
TYPE OF EXPOSURE INHALATION	TOXIC	TLV - 5-30 PPM	SOLVOX TESTING DEPARTMENT
SKIN CONTACT	STRONG SENSITIZER	HUMAN PATCH TEST	SOLVOX TESTING DEPARTMENT
SKIN ABSORPTION	MODERATELY TOXIC	APPLIES TO INTACT AND ABRADED SKIN OF 6 RABBITS	SOLVOX TESTING DEPARTMENT
EYE CONTACT	SEVERE IRRITANT	APPLICATION TO EYE OF 6 ALBINO RABBITS	SOLVOX TESTING DEPARTMENT
INGESTION	MODERATELY TOXIC	L.D. 50 RATS 500MG/KG.	SOLVOX TESTING DEPARTMENT

EFFECTS OF OVEREXPOSURE

ACUTE OVEREXPOSURE

INGEST-NAUSEA AND VOMITING, IRRITANT TO EYES, SLIGHT IRRITATION TO SKIN

CHRONIC OVEREXPOSURE

IRRITATION TO SKIN AND EYES

EMERGENCY AND FIRST AID PROCEDURES

EYES:

WASH THOROUGHLY WITH WATER (COOL) FOR 15 MINUTES - CALL PHYSICIAN

SKIN:

WASH THOROUGHLY WITH SOAP AND WATER

INHALATION:

REMOVE SUBJECT FROM AREA OF INTOXICATION TO PLACE WITH FRESH AIR

INGESTION:

CALL PHYSICIAN IMMEDIATELY

NOTES TO PHYSICIAN

EMPTY STOMACH BY GASTRIC LAVAGE WITH MILK, SOAP WATER, TAKE SALT IN WARM WATER OR PLAIN TAP WATER. KEEP PATIENT WARM AND QUIET UNTIL DOCTOR ARRIVES.

IX SPECIAL PRECAUTIONS

PRECAUTIONARY STATEMENTS

HANDLING: USE CLEAN AND DRY EQUIPMENT
STORAGE: STORE IN COOL DRY PLACE AWAY FROM SUNLIGHT, HEAT OR MOISTURE

OTHER HANDLING AND STORAGE REQUIREMENTS

PARTIALLY USED CONTAINERS SHOULD BE RESEALED. ANY SPILLAGE MUST
BE FLUSHED AWAY. YELLOW LABEL APPLIES

ADDITIONAL REGULATORY CONCERNS

FEDERAL:

FDA SUB-PART F, SECTION: ~~121.101H~~ 182.90

USDA

CPSC

TECA IS THIS PRODUCT, OR ALL ITS INGREDIENTS, BEING CERTIFIED FOR INCLUSION ON THE TOXIC SUBSTANCES CONTROL
INVENTORY OF CHEMICAL SUBSTANCES? _____

OTHER

STATE:

PREPARED BY

J. KRUEGER

TITLE:

CHIEF CHEMIST

COMPANY:

SOLVOX MFG. COMPANY

ADDRESS:

11725 W. FAIRVIEW AVENUE, MILWAUKEE, WI

SOLVOX MFG. COMPANY
MATERIAL SAFETY DATA SHEET

Manufacturer's Name Solvox Mfg. Company Emergency Telephone 414-774-5664
Address 11725 W. Fairview Avenue Milwaukee, Wisconsin 53226
Trade Name SOLVOX SPECIAL K.B.

HAZARDOUS INGREDIENTS

Paints, Preservatives & Solvents % TLV	Alloys and Metallic Coatings % TLV
Pigments _____	Base Metal _____
Catalyst _____	Alloys _____
Vehicle _____	Metallic Coatings _____
Solvents _____	Others _____
Additives <u>CALCIUM OXYCHLORIDE</u>	
Others _____	

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES % TLV

PHYSICAL DATA

Boiling Point (°F.) _____	Specific gravity (H ₂ O=1) _____
Vapor Pressure (mm Hg.) _____	Percent Volatile by Volume (%) _____
Vapor Density (AIR=1) _____	Evaporation Rate _____
Solubility in water <u>COMPLETE</u>	Appearance & Odor <u>WHITE POWDER WITH PUNGENT</u> <u>ODOR (CHL)</u>

FIRE AND EXPLOSION HAZARD DATA

Flash point (method used) _____
Flammable Limits _____
Extinguishing Media BURNING MATERIAL SHOULD BE DELUGED WITH WATER ONLY
Special Fire Fighting procedures _____
Unusual Fire and Explosion Hazards _____

HEALTH HAZARD DATA

Threshold Limit Value UNKNOWN

Effects of Overexposure IRRITANT

Emergency & First Aid Procedures IRRIGATE EYES WITH WATER: WASH CONTAMINATED ARE
OF BODY WITH SOAP AND WATER

REACTIVITY DATA

Stability Unstable Conditions to Avoid Stable XXX

Incompatibility (Materials to Avoid) REDUCING MATERIALS

Hazardous Decomposition Products TOXIC FUMES

Hazardous May Occur Conditions to Avoid
Polymerization Will Not Occur XXX

SPILL OR LEAK PROCEDURES

Steps to be taken in case materials are released or spilled SWEEP UP AND THEN
ENTIRE AREA WITH WATER AND MOP UP

Waste Disposal Method SEWER WITH COPIOUS AMOUNTS OF WATER

SPECIAL PROTECTION INFORMATION

Respiratory Protection MECHANICAL FILTER RESPIRATOR

Ventilation Local Exhaust XXX Special

Mechanical (Gen) Other

Protective Gloves RUBBER/POLYETHYLENE Eye Protection GOGGLES

Other protective equipment

SPECIAL PRECAUTIONS

Precautions to be taken in handling & storing KEEP IN DRY PLACE AWAY FROM HEAT AND
OPEN FLAME. YELLOW LABEL APPLIES

Other Precautions

**PRODUCT SAFETY
DATASHEET****CHEMICALS COMPANY****A. GENERAL INFORMATION**

TRADE NAME (COMMON NAME OR SYNONYM) Sulfuric Acid		<input checked="" type="checkbox"/> C.A.S. NO. <input type="checkbox"/> ALLIED PRODUCT CODE # 7664-93-9	
CHEMICAL NAME Sulfuric Acid			
FORMULA 58% to 99% H ₂ SO ₄ in water		MOLECULAR WEIGHT 98.08	
COMPANY/PLANT ADDRESS (No., STREET, CITY, STATE AND ZIP CODE) Chemicals Company P.O. Box 1139R Morristown, N.J. 07960			
CONTACT Director - Technical Service	PHONE NUMBER (315) 487-4990	ISSUED DATE June 12, 1980	REVISED DATE

B. FIRST AID MEASURES

Skin or Eyes: Promptly flush with plenty of water for at least 15 minutes. Remove contaminated clothing. Ingestion: Drink large amounts of water (or milk if available) to dilute the acid. Do not induce vomiting. Get prompt medical attention for ingestion, inhalation, eye contact, irritation or burns. Additional procedures are outlined in references listed in Section J.	EMERGENCY PHONE NUMBER (201) 455-2000
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C. HAZARDS INFORMATION**FIRE AND EXPLOSION**

FLASH POINT Not Flammable <input type="checkbox"/> OPEN CUP <input type="checkbox"/> CLOSED CUP	AUTO IGNITION TEMPERATURE NA - Not Applicable	FLAMMABLE LIMITS IN AIR (% BY VOL.) LOWER NA UPPER NA
UNUSUAL FIRE AND EXPLOSION HAZARDS Flammable and potentially explosive hydrogen gas can be generated inside metal drums and storage tanks. Concentrated acid can ignite combustible materials.		

HEALTH

INHALATION Inhalation of fumes or acid mist can cause irritation or corrosive burns to the upper respiratory system, including nose, mouth and throat. Lung irritation and pulmonary edema can also occur.	
INGESTION Can cause irritation and corrosive burns to mouth, throat, and stomach. Can be fatal if swallowed.	
SKIN Can cause corrosive burns or irritation.	
EYES Can cause irritation, corneal burns, and conjunctivitis.	
PERMISSIBLE CONCENTRATION: AIR (SEE SECTION J)	BIOLOGICAL Threshold Limit Value (TLV): 1 mg/m ³ as 100% H ₂ SO ₄
UNUSUAL CHRONIC TOXICITY	

Lift up this sheet

DE- PRECAUTIONS/PROCEDURES

VENTILATION

Sufficient to reduce acid mist below current permissible TLV levels.
Packaging and unloading areas and open processing equipment may require mechanical exhaust systems.

NORMAL HANDLING
Use protective equipment outlined in Section E. Procedures are detailed in references listed in Section J. Safety showers and eyewash facilities should be available nearby all H_2SO_4 handling equipment. Do not add water to acid. When diluting, always add acid to water cautiously and with agitation.

STORAGE

Store in cool, well-ventilated area away from combustibles and reactive chemicals. Vent metal containers weekly or more frequently in hot weather to prevent H_2 gas build-up. Diking of storage tanks is recommended.

PRECAUTIONARY LABEL ☐ ATTACHED ☒ NOT ATTACHED

Label warning statement(s): "Danger! Liquid is corrosive. Causes severe burns. Vapor may contain explosive hydrogen. Keep sources of ignition away."

SPILL OR LEAK

Dilute small spills or leaks cautiously with plenty of water. Neutralize residue with alkali such as soda ash or lime. Adequate ventilation is required for soda ash due to release of CO_2 gas.
(See Section I for disposal methods.)

FIRE EXTINGUISHING AGENTS RECOMMENDED

NA

SPECIAL FIRE FIGHTING PRECAUTIONS

At high temperatures, H_2SO_4 mists or SO_3 gas can be released from vented or ruptured containers. If water is added to concentrated sulfuric acid, violent spattering can occur, and considerable heat may be evolved. Full protective equipment is recommended.

FIRE EXTINGUISHING AGENTS TO AVOID

NA

SPECIAL PRECAUTIONS/PROCEDURES

To prevent ignition of hydrogen gas generated in metal containers from contact with sulfuric acid, smoking, open flames, and sparks must not be permitted in storage areas.

DE- PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION

Where required, use a respirator approved by NIOSH for sulfuric acid gas or mists, as applicable. Some exposures may require NIOSH-approved, self-contained breathing apparatus or air-supplied respirator.

EYES AND FACE

As a minimum, wear hard hat, chemical safety goggles, and full-face plastic shield. Do not wear contact lenses.

HANDS, ARMS, AND BODY

As a minimum, wear acid-resistant apron, protective clothing, boots and gauntlet gloves for routine product use. For increased protection, include acid-resistant trousers and jacket.

OTHER CLOTHING AND EQUIPMENT

MATERIAL 15 (AT NORMAL CONDITIONS): <input checked="" type="checkbox"/> LIQUID <input type="checkbox"/> SOLID <input type="checkbox"/> GAS <input type="checkbox"/> _____			APPEARANCE AND ODOR Oily, colorless to slightly yellow, clear to turbid liquid. Odorless.		
BOILING POINT a. 136 °C b. 279 °C MELTING POINT c. 310 °C		SPECIFIC GRAVITY • (H ₂ O = 1) a. 1.480 b. 1.835 c. 1.842		VAPOR DENSITY (AIR = 1) <p style="text-align: center;">NA</p>	
SOLUBILITY IN WATER (% by weight) <p style="text-align: center;">complete</p>		pH <p style="text-align: center;">1% solution; pH = 0.9</p>		VAPOR PRESSURE (mm Hg at 20° C) <p style="text-align: center;">negligible</p>	
EVAPORATION RATE (Butyl Acetate = 1) <p style="text-align: center;">Less than 1</p>		% VOLATILES BY VOLUME (At 20° C) <p style="text-align: center;">NA</p>		(*) a. 47° Be' = 58% H ₂ SO ₄ b. 66° Be' = 93% H ₂ SO ₄ c. 99% H ₂ SO ₄	

6. REACTIVITY DATA	
STABILITY <input type="checkbox"/> UNSTABLE <input checked="" type="checkbox"/> STABLE	CONDITIONS TO AVOID
INCOMPATIBILITY (MATERIALS TO AVOID) Avoid contact with combustible materials, carbides, chlorates, nitrates, fulminates, picrates, metallic powders, sulfides, or strong reducing agents. Considerable heat is evolved, and violent reaction can occur if water is added to acid in a container.	
HAZARDOUS DECOMPOSITION PRODUCTS SO ₃ gas	
HAZARDOUS POLYMERIZATION <input type="checkbox"/> MAY OCCUR <input checked="" type="checkbox"/> WILL NOT OCCUR	CONDITIONS TO AVOID

[illegible]

ENVIRONMENTAL

DEGRADABILITY

OCTANOL/WATER PARTITION COEFFICIENT

WASTE DISPOSAL METHODS*

Dilute with water, neutralize with alkali and flush to sewer with plenty of water if permitted by applicable disposal regulations. Neutralized waste may have to be disposed of by an approved contractor.

*DISPOSER MUST COMPLY WITH FEDERAL, STATE AND LOCAL DISPOSAL OR DISCHARGE LAWS.

REFERENCES**PERMISSIBLE CONCENTRATION REFERENCES**

OSHA standard, 29 CFR, Part 1910.1000 (July 1, 1977).

"Criteria for a Recommended Standard . . . Occupational Exposure to Sulfuric Acid,
"NIOSH (U.S. Dept. of HEW), 1974.

REGULATORY STANDARDS

DOT Classification - Corrosive; Placard - Corrosive; Label - Corrosive (49 CFR). Designated a hazardous substance for spills by EPA (40 CFR, Parts 116 - 117).

GENERAL

"Criteria for a Recommended Standard . . . Occupational Exposure to Sulfuric Acid," NIOSH (U.S. Dept. of HEW) 1974. Also available are Allied Chemical's sulfuric acid wall chart, a Technical Service Report which discusses storage and handling, and a product information bulletin.

ADDITIONAL INFORMATION

Information (hazards, precautions, first aid, etc.) is abbreviated. More detailed information is contained in references found in Section J.

This product is not for food or drug use.

THIS PRODUCT SAFETY DATA SHEET IS OFFERED SOLELY FOR YOUR INFORMATION, CONSIDERATION AND INVESTIGATION. ALLIED CHEMICAL PROVIDES NO WARRANTIES, EITHER EXPRESS OR IMPLIED, AND ASSUMES NO RESPONSIBILITY FOR THE ACCURACY OR COMPLETENESS OF THE DATA CONTAINED HEREIN.

Information pertains to product as received in drum. The information on this form is furnished solely for the purpose of compliance with the Occupational Safety and Health Act of 1970 and shall not be used for any other purpose. Use or dissemination of any part for any other purpose is illegal.

SECTION I Product Name or Number: TEXO LP 566
Manufacturer's Name: TEXO CORPORATION Emergency Phone No.: (513) 731-3400
Address: 2201 Highland Avenue, Cincinnati, Ohio 45212

SECTION II HAZARDOUS INGREDIENTS	%	TLV (Units)
<u>Emulsifiers</u>	<u>20</u>	<u>N/A</u>
<u>Solvents</u>	<u>80</u>	<u>100 ppm</u>

SECTION III PHYSICAL DATA Appearance and Odor Water white color, mild solvent odor
Boiling Point (°F.) 360 Specific Gravity (H₂O=1) 0.9 @ 60° F
Vapor Pressure (mm Hg) > than 1 mm @ 20° C Percent Volatile by Volume 80 max
Vapor Density (Air=1) 4.8 Evaporation Rate 0.04
Solubility in Water Negligible (N-butyl Acetate = 1)

SECTION IV FIRE AND EXPLOSION HAZARD DATA
Flash Point Tac Closed Cup 150° F Flammable Limits Le1 0.9 Uel 6.5
Extinguishing Media Foam, dry chemical, carbon dioxide, water spray or fog.
Special Fire Fighting Procedures Use air supplied rescue equipment for enclosed areas. Cool exposed container with water. Do not store or mix with strong oxidants.

SECTION V HEALTH HAZARD DATA Threshold Limit Value 100 ppm for 8 hr. working day
Effects of Overexposure Inhalation of high concentrations may be cause of results ranging from mild depression to loss of consciousness.

Emergency and First Aid Procedures If overcome by vapor, remove from exposure immediately & call a physician. If breathing is irregular or stopped, start resuscitation, administer oxygen. Remove contaminated clothing & wash skin, flush eyes with water until irritation subsides.

SECTION VI REACTIVITY DATA Stable X Hazardous Polymerization Will Not Occur X
Conditions to Avoid High temperature or heat
Materials to Avoid Oxygen & strong oxidants. May dissolve plastic & rubber
Hazardous Decomposition Products Incomplete combustion produces carbon monoxide.

SECTION VII SPILL OR LEAK PROCEDURES
Steps to be Taken in Case Material is Released or Spilled Remove all ignition sources. Keep people away. Recover free liquid. Add absorbent to spill area. Avoid breathing vapor. Ventilate enclosed areas. Open all doors & windows.

Waste Disposal Method Recover free liquid. Use personnel protective equipment. Absorb with dry solids and dispose of in accordance with local and federal regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION

Respiratory Protection: Hydrocarbon vapor canister supplied air or a hose mask.
Ventilation: Local exhaust greater than 60 FPM. Use only with adequate equal to outdoor ventilation. Mechanical explosion proof ventilation equipment.
No smoking or open lights.

Protective Equipment: Hydrocarbon insoluble rubber or plastic gloves. Chemical goggles or face shield. Hydrocarbon insoluble apron such as neoprene or equivalent.

SECTION IX ADDITIONAL PRECAUTIONS
Keep containers closed away from open flames & heat. Use only with adequate ventilation to prevent or reduce breathing or vapor or contact with skin.

CAUTION: This product has a flash point. Do not use near flames, open spark areas, heated areas to prevent ignition. Avoid contact with skin, eyes or clothing. Wash skin, eyes or clothing thoroughly with water for 15 minutes and get medical attention for accidental contact with eyes. Keep out of the reach of children. Do not take internally.



BORDEN CHEMICAL

ADHESIVE AND
CHEMICAL
PRODUCTS

TDS 16-1
November, 1977

CASCO RESIN PR-335 Cationic Urea Formaldehyde Wet Strength Resin

DESCRIPTION: CASCO RESIN PR-335 is a concentrated, high efficiency modified urea formaldehyde resin designed expressly for wet strength paper manufacture. CASCO RESIN PR-335 produces a wet strength paper with excellent physical properties. Definite improvements have been realized in dry strength as well as wet strength with several types of pulp. These include a variety of unbleached krafts, sulfites, groundwoods, etc., or combinations thereof.

PROPERTIES OF PR-335*

Type:	Cationic Urea Formaldehyde			
Solids:	35 + 1			
Weight Per Gallon:	9.6 lbs.			
Color:	Light Amber (Gardner 4 Max.)			
Odor:	Mild Formaldehyde			
Viscosity, Gardner-Holt:	E-/F+ - Brookfield, RVF, 1/20 RPM @ 25°C. 80/120 cps.			
pH	6.8 ± 0.1			
Storage Life (Months):	50°F.** 6	70°F. 3	90°F. 1	110°F. 1/4
Specific Gravity:	1.15			

* At time of manufacture

** A false gelation occurs at 50°F. which varies with time from batch to batch. This gelation is reversible on warming to 70°F.

FREEZE-THAW STABILITY: CASCO RESIN PR-335 is not damaged by freezing. If frozen allow it to return to room temperature slowly and stir it before use.

RESIN PREPARATION: CASCO RESIN PR-335, available in quantities from drums to tank cars, has excellent dilutability characteristics. It may be diluted by simple addition of water and stirring, or may be used without dilution. If used undiluted, care should be exercised to insure complete distribution of the resin within the pulp stock. No catalysis or other preparation is required.

POINT OF RESIN ADDITION: The point of resin addition varies according to the mill and the paper making machine. It is most important that the addition of resin be made after all pulp refining has taken place. CASCO RESIN PR-335 being "cationic" attaches readily to the paper fibers. The resin can be added through consistency regulators, proportioners, etc., into the fan pump, headbox or at other locations with excellent results. CASCO RESIN PR-335 may also be added directly to the beater at the completion of the milling cycle and after necessary pH adjustments have been made.

RESIN TO PULP RATIO: Ultimate wet strength is directly related to the resin to pulp ratio. Normal addition levels range from 0.5% to 3.0% based upon the furnish solids present. Typically, a bleached sulfite-groundwood furnish comparable to that used in towelling requires approximately 1.0 to 1.5% resin addition. Unbleached kraft stocks may require as little as 0.5 to 0.75% to impart the desired wet strength properties.

MILL pH CONTROL: The acidity of the furnish controls the curing of the resin and subsequent wet strength development in the paper sheet. It has been found that most mills using PR-335 type resins prefer a pH range of 4.0-5.0 in order to obtain the ultimate in resin efficiency and strength properties. When the pH is above 5.0 the ultimate in resin efficiency and strength is not obtained. This pH is normally controlled by the addition of alum, muriatic or sulfuric acids. Finally, the pH of the slurry should be readjusted if necessary after the addition of the wet strength resin. The addition of higher amounts of wet strength resin often raises the pH of the furnish above the desired 4.0-5.0. In some operations it has been found necessary to meter the flow of both acid and resin in order to maintain optimum pH conditions.

FDA STATUS: CASCO RESIN PR-335 is described in Food and Drug Administration Regulation 176.170 "Components of Paper and Paperboard in Contact with Aqueous and Fatty Foods;" and, by cross reference in Regulations 176.180 "Components of Paper and Paperboard in Contact with Dry Food."

TECHNICAL ASSISTANCE: If special problems arise which are not covered in this bulletin, please contact your nearest Borden Representative or the Sales Manager, Borden, Inc./Chemical Division, Adhesive and Chemical Products, 180 East Broad Street, Columbus, Ohio, 43215.

EXHIBIT A

Contact	Position	Location
David Adams	Supt- Plant Maintenance	Milan, MI
Patrick Altemus	Plant General Mgr I - Packaging	Milan, MI
Jeff Altom	Mgr -Env't'l Safety & Health	West Chester, OH
Scott Bailey	Director - Env't'l Compliance NACP	Atlanta, GA
Matthew Barker	Supt- Plant Maintenance	Mt. Olive, IL
Tara Barrett	Env't'l Site Coordinator II	Columbus, OH
Dianne Bartlett	Plant Controller	Mt. Olive, IL
Jerry Birchmeier	Plant Mgr I- Packaging	Owosso, MI
Ken Blankenship	Regional Env't'l Mgr	Atlanta, GA
Mike Bond	Mgr Env't'l Health & Safety	Oshkosh, WI
Dave A. Buchanan	Regional Security Mgr	Rochelle, IL
Doug Bullock	Plant General Mgr II	Sheboygan, WI
Traylor Champion	VP- Environmental Affairs	Atlanta, GA
Kevin Conley	Plant Mgr I - Packaging	Akron, OH
Roger Cragg	Supervisor- Maintenance Packaging	Owosso, MI
Jay Darling	Supt- Plant Maintenance	Chicago, IL
Forrest Denney	Business Env't'l Mgr	Atlanta, GA
Caroline Depp	Regional Env't'l Mgr	Atlanta, GA
Jim L. Dozier	Senior Env't'l Engineer	Atlanta, GA
Chase C. Fortenberry	Mgr -Env't'l Engineering	Beavercreek, OH
Garry Griffith	Director - Field Env't'l Service	Kalamazoo, MI
Mike Haire	Env't'l Health & Safety Mgr	Albion, MI
Steve Hall	Account Representative (now w/ GP in West Chester, OH)	Indianapolis, IN
Mike Hassett	Mgr - Env't'l Engineering	Atlanta, GA
Ken Hemingway	Env't'l Engineer	FL

EXHIBIT A

Contact	Position	Location
Jim J. Holmes	Mgr - Env't'l Engineering	Atlanta, GA
Dave Horn	Plant Mgr I - Packaging	Milan, MI
Ron Iden	Plant Mgr I - Packaging	Circleville, OH
Steve Jevyak	General Mgr	Chicago, IL
Steve J. Kuhlman	Senior Mgr Env't'l Compliance	Parchment, MI
Thomas R. Lochner	Mgr - Quality Control	Phillips, WI
Joe Lott	Regional Env't'l Mgr	Atlanta, GA
Craig Lowe	Director - Engineering	Atlanta, GA
Larry Markham	Safety Coordinator	Circleville, OH
Dave Mason	Plant Mgr II - Chemical	Columbus, OH
Dave G. Massengill	Senior Director- Env't'l Engineering	Atlanta, GA
Wynn McGilvra	Supt- Plant Maintenance	Albion, MI
Greg McNeil	Plant General Mgr I - Packaging	Akron, OH
Paul Montney	Director - Field Env't'l Service	Newark, NJ
Tom Mosher	Regional Env't'l Mgr	Atlanta, GA
Brian Parizek	Supervisor- Maintenance Packaging	Oshkosh, WI
Stan Richards	Senior Counsel	Atlanta, GA
Scott Rois	Director - Audit Compliance (EHS)	Atlanta, GA
Gary Simmons	Mgr Env't'l Safety & Health	Milan, MI
Byron Spencer	Plant Mgr I - Packaging	Richmond, IN
Jim H. Stauffer	Senior Mgr - Logistics	Atlanta, GA
Gregg Thomas	Senior Mgr -Env't'l Engineer	Atlanta, GA
Carl Wright	Plant General Mgr I- Packaging	Circleville, OH
Amy Zetzl	Operations Mgr	Richmond, IN
Gary Garski	Former Employee	Sheboygan, WI

CD 2 of 2

Georgia-Pacific LLC

Confidential Business Information

Exhibits To EPA's 104(e) Information Request Re
Gary Development Landfill Superfund Site

March 29, 2012